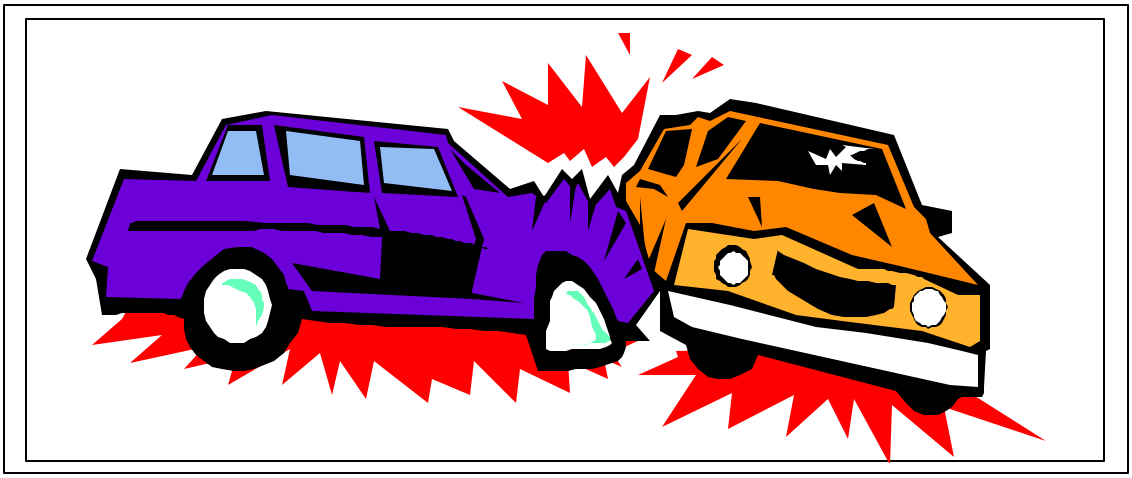
Compliance Assistance Workbook for the Northern Virginia Auto Body Shop Self-Certification Program



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Introduction

In March 2004 Virginia adopted an air quality regulation, 9 VAC 5-40-6990 (Article 48) that requires all auto body shops in Northern Virginia to register their facility(s) and meet specific requirements. The original compliance date was January 1, 2005. In order to facilitate this process the Virginia Small Business Assistance Program and the Northern Virginia Regional Office of DEQ have provided in this workbook the necessary forms and instructions for you to register. Registration is mandatory and separate from participation in the Northern Virginia Auto Body Self Certification Program.

The Virginia Department of Environmental Quality is pleased to introduce you to the **Northern Virginia Auto Body Self-Certification Program**. This Program is a voluntary program to assist you in complying with the air regulation mentioned above and other environmental regulations.

If your shop is in the following counties or cities the regulation applies to you and you may participate in this voluntary self-certification program:

Arlington County, Fairfax County, Loudoun County, Prince William County, Stafford County, Alexandria City, Fairfax City, Falls Church City, Manassas City and Manassas Park City.

This workbook is your primary reference to successfully participate in the Auto Body Self-Certification Program. This workbook should be used along with the self-certification checklist and forms found at the back of this workbook.

Who should read this workbook?

Owners and on-site managers for auto body repair and refinishing businesses.

Why should you read this workbook?

This workbook will help you to:

1. Learn and understand the federal and state environmental requirements that apply to your shop;
2. Determine if your shop is following environmental laws and regulations;
3. Complete the Auto Body Self-Certification Checklist, if you wish to participate;
4. Register your Auto Body Shop; and
5. Potentially improve the operation of your auto body shop and save some money.

How is this workbook organized?

This workbook has five Sections. Each Section covers an important area that Virginia auto body shops should consider in trying to improve their environmental performance:

- Best Practices
- Air Pollution
- Hazardous Waste
- Solid Waste, Universal Waste and Used Oil
- Water Pollution

Each Section will cover:

- Why is this important to you?
- Do the requirements apply to your shop?
- What are the requirements?
- What do you need to know to fill out the self-certification checklist?
- What good ideas or best management practices can you follow to take your shop beyond compliance?

Although this workbook looks long, it is divided into sections that can be read and used separately as you need them or in any order you choose. You do not need to read the workbook all at once. For each Section, read the introduction to find out if that section applies to your shop. We highly recommend that you have the Auto Body Self-Certification Checklist handy as you read and use the different sections. It will help you answer the Checklist questions.

Incentives:

1. DEQ Auto Body Self-Certification Program

All auto body shops that submit their registration form by January 9, 2006 and that commit to participating in the voluntary Auto Body Self-Certification Program may not be subject to any compliance action related to operation of their facility. There is not, however, a deadline for the submittal of the Self-Certification Program Package or a shop's decision to participate. Shops can sign up at anytime. Until such time that a shop actually submits the Self-Certification Package for the Program it will remain subject to inspection. For those shops that decide to participate in the Self-Certification Program we will provide recognition for your shop's participation. We plan to develop future training opportunities if you participate in the program (come to the workshops for more information). We also hope to create a Virginia DEQ Certified Shop designation.

2. DEQ Small Business Assistance Program Approach

Any auto body shop that does not participate in the Auto Body Self-Certification Program can still request registration through the Small Business Assistance Program. A shop may be subject to enforcement action without a valid registration. Without participation in the Auto Body Self-Certification Program you will not be able to self-certify your compliance annually and may be subject to compliance inspection.

3. DEQ Enforcement Approach

Any auto body shop that does not participate in the Environmental Results Program or seek help through the Small Business Assistance Program that has not registered by **January 10, 2006** will be considered in violation of state and federal regulations and may be subject to enforcement action.

Thanks for participating!

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Section 1:

Best Practices

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1.1 Pollution prevention: simple ways to save money and protect the environment

Pollution prevention means reducing waste and reducing the use of pollutants in your shop. Pollution prevention is usually the easiest and cheapest way to protect the environment and maintain a safe, healthy environment for you, your workers, and your neighbors. You can prevent pollution by reducing your use of hazardous materials, handling these materials carefully, and conserving water and energy. Since pollution can waste money and resources, preventing pollution can help you:

- Reduce operating costs of your business: including your cost of materials, energy, water, and sewer;
- Reduce waste disposal costs;
- Reduce long-term liability for environmental problems;
- Protect the environment;
- Improve workplace safety and health; and
- Project a positive public image to your customers and neighbors.

This Section will:

- List the top ten things you can do to improve your shop through pollution prevention;
- List the "Do's and Don'ts" for materials you may have in your shop; and
- List suggestions on recycling auto body shop materials.

For additional tips, please call DEQ's Pollution Prevention Program at (804) 698-4079 or visit http://www.deq.virginia.gov/p2/gasstations.html.

Top ten tips for improving your shop

The following list describes ten very important things you can do to prevent pollution in your auto body shop. If you follow these ten tips, you will be well on your way to having a clean, safe, and efficient auto body shop. Be sure you also read the rest of this workbook to understand additional steps you must take to be in compliance with Virginia and federal law.
To prevent pollution from your auto body shop you should:

1. **Choose less toxic and polluting products.** You can identify the toxic content of your materials by checking the Material Safety Data Sheets (MSDSs) and the labels. Your materials supplier can help you find better materials to use in your shop. Ask your supplier to help you:

    - **Eliminate methylene chloride paint strippers**. Methylene chloride is a regulated hazardous waste that can cause cancer and worsen heart problems. The best way to avoid the risks and costs of dealing with methylene chloride is not to use it. Instead, you can remove paint from cars with a ventilated sander. If you have to use a chemical paint stripper, make sure it doesn't contain methylene chloride.

- **Use low volatile organic compound (VOC) paints**. VOCs are chemicals that evaporate readily into the air from materials like paints and solvents. VOCs contribute to ground level ozone, which is a public health concern (for example, ground level ozone can worsen asthma attacks). See **Section 2** for a table of allowable VOC limits.
- **Use water-based/low VOC cleaners and solvents.**
- **Consider using waterborne primer and basecoat.** This technology is becoming more common in auto body shops as a way of replacing solvent-based paint systems. Though additional equipment is needed, waterborne coating technology can reduce pollution and make workplaces healthier.
- **Make sure your yellow, orange, and red tints do not contain lead or lead chromates or other inorganic metals like cadmium and zinc.** These metals are toxic and should be avoided wherever possible.

2. **Manage and store materials carefully.** Keep your shop organized and follow the good housekeeping tips described in this workbook. Only order the amount of materials you need to make sure your materials do not expire or become obsolete. It is a good idea to have just one person responsible for ordering materials and keeping track of inventories. Be sure you follow the requirements for hazardous and universal wastes and waste oil described in **Section 3**. These materials cannot be put in the regular trash. It is your responsibility to identify these wastes and handle them properly.

3. **Reduce your use of solvents.** Use an enclosed spray gun cleaner that recirculates solvent. This type of system reduces solvent fumes, the amount of solvent you need for cleaning spray guns, and the amount of solvent waste you generate. Consider using a solvent recycling still ("thinner recycler") to reduce the costs of both waste disposal and buying new solvent. Also, do not use solvents to clean your hands or skin. Solvents can soak through your skin and make you sick. Instead, use a commercial soap solution made for paint cleanup purposes. Finally, reduce your use of solvents for cleaning your paint spray booth. If you have to clean up excess paint, scrape off as much as possible, and then use water-based or low VOC cleaners instead of concentrated solvent-based cleaners.

4. **Minimize exposures to auto body dust.** Sanding dust may contain toxic metals such as lead, lead chromates, cadmium and zinc. Most shops use disc sanders to remove paint/body filler compound from cars, and these sanders create dust that can be dangerous for your workers and neighbors. The best way to minimize exposure to dust is to use a ventilated sander and to do sanding work in an enclosed area with a ventilation system. See Section 2 for more information on how to control dust from auto body work.

5. **Use High Volume Low Pressure (HVLP) spray guns.** Use High Volume/Low Pressure (HVLP) spraying equipment in order to make your painting more efficient (may be required by air regulation). HVLP spray guns can achieve a paint transfer efficiency of at least 65%, which means you will use less paint and have less waste and save money. **Training in how to use HVLP spray guns effectively will be offered as part of the workshops for the Virginia Self-Certification Program.** Make sure you attend one of the workshops to get hands-on tips.

6. **Know where your wastewater goes.** In most cases, there are only two places where you are allowed to send wastewater from your shop operations: a public sewer or your septic system. In either case, you must make sure that you are meeting the requirements described in Section 5. (For example, if you are on a public sewer you must have a permit from your local sewage treatment plant. If you are on septic system you must have an oil/water separator.) Remember there are some things that should *never* be flushed down a drain, such as flammable materials. Also, if you have a floor drain in your shop, it should have been closed by April 2005, unless you met certain requirements. The requirements for wastewater and floor drains are explained in Section 5 of this workbook.

7. **Train your workers.** Make sure your painters are trained in how to minimize overspray when painting. This will save paint and money and prevent air pollution. Each year, train workers to safely and properly handle hazardous waste. Workers should understand how to prevent spills by not overfilling containers. Employees should be trained to use funnels with lids that are kept closed when not in use. Workers should also be trained in what to do in case of a spill. Further information can be found in Section 3. Finally, give employees simple incentives to keep their work areas clean and minimize chemical use.

8. **Manage shop towels according to regulation.** You should reduce the amount of paints and solvents on your shop towels as much as possible. Shop towels should either be sent off-site for laundering at a properly licensed commercial laundry facility or treated and disposed of as hazardous waste. Do not air dry.

9. **Consider using paintless dent removal (PDR).** In certain applications, PDR can replace conventional refinishing, thereby reducing waste and pollution. As you may be aware, PDR is a purely mechanical process that uses special tools to restore sheet metal back to its original form by removing small dents, creases, and surface imperfections without the need for repainting. If PDR sounds right for you, call your local distributor for more information.

10. **Use energy and water efficiently.** Improving energy and water efficiency will save you money and help protect the environment. Make sure air compressor lines don't leak air or oil; leaks cost money. Keep garage doors closed to save on heating and cooling costs. Limit your use of wash water wherever possible, as described in Section 5. Also, turn off the lights when they are not in use and use energy efficient light bulbs. Avoid buying light bulbs with high mercury content, as described in Section 3.4 of this workbook. When you buy new electrical equipment (e.g., computers or air conditioners), look for the ENERGY STAR symbol, which tells you that the equipment is energy efficient. Consider using spray booths or prep stations that are insulated and recirculate air to avoid the expense of heating so much outside air.

Do's and Don'ts for common materials in auto body shops

The following table, while not all inclusive, provides suggestions for how to properly manage materials commonly found in auto body shops. The guidelines below are not requirements, but all are recommended practices. Requirements are described later in this workbook.

Material	DO:	DON'T:
ANTIFREEZE	✓ Recycle your own antifreeze or use a recycling service. ✓ Consider keeping antifreeze in two separate, closed containers: one for antifreeze that can't be reused marked "WASTE ANTIFREEZE ONLY," and one for antifreeze that can be reused marked "USABLE ANTIFREEZE ONLY." ✓ Manage antifreeze recycling waste appropriately. If you recycle antifreeze on the premises, the filters and other recycling by-products may be a hazardous waste. ✓ If you have waste antifreeze you cannot recycle and you must discard, use licensed disposal contractors. For more information call DEQ's **Steve Coe at (804) 698-4029 or check http://www.deq.virginia.gov/recycle/usedoil.html**	✘ Dispose of antifreeze to a septic tank or the sewer. ✘ Dispose of antifreeze to a storm drain, septic tank, or dry well, and never pour antifreeze on the ground. ✘ Mix waste antifreeze with any other waste. Keep it separate.
BRAKE FLUID	✓ Recycle brake fluid. Brake fluid can be mixed with other used oils for recycling. ✓ Mark the container "used oil only."	✘ Put brake fluid down any drain or on the ground. ✘ Spray brake cleaner around brake fluid.

Material	DO:	DON'T:
CAR BATTERIES	✓ Send used lead-acid batteries to a battery manufacturer for regeneration or to a battery recycler. If you do this, your waste batteries will not be regulated as universal waste. Be sure to send off your batteries for recycling at least every six months. ✓ Store batteries upright in a secure, covered place and check them often for leaks.	✘ Store batteries outside. ✘ Store used batteries for more than six months. ✘ Put batteries in the garbage. ✘ Drain batteries into a drain or on the ground.
PARTS WASHERS AND OTHER SOLVENT CONTAINERS	✓ Consider switching to a less hazardous, non-chlorinated cleaner, e.g. detergent or citrus based cleaner. Consider using dry ice for cleaning. Dry ice freezes dirt and the dirt comes right off. ✓ Keep the container closed when not in use to avoid evaporation. Keep different types of solvents in separate, labeled, closed containers. ✓ When spent, label the container "HAZARDOUS WASTE – SPENT SOLVENTS." ✓ Accumulate all sludge from cleaning solvent containers in a closed, labeled container and dispose of as hazardous waste. ✓ Consider purchasing your own solvent still and recycling solvent onsite. (Sludges, filters and still bottoms generated from onsite solvent recycling are typically hazardous.) ✓ Make sure solvent is actually too dirty to use anymore before it is exchanged for new solvent. ✓ If you recycle onsite, keep a log of dates, recycled amounts and batch make-up amounts. ✓ Install a filter on your parts washer to greatly increase the life of the solvent (but remember to dispose of the filters as a hazardous waste).	✘ Use chlorinated solvents for any kind of cleaning or clean-up in your shop. If you do you may be subject to additional air regulations. ✘ Dispose of spent solvent or cleaner down any storm drain, septic system, dry well, sewer, or on the ground. ✘ Evaporate solvents as a means of disposal. ✘ Put sludge from your cleaning solvent containers into the dumpster or on the ground. ✘ Mix solvents with any other waste. ✘ Keep or handle solvents near used oil.

Material	DO:	DON'T:
FREON (CFCs)	✓ Recycle waste Freon on the premises using EPA certified recycling or recovery equipment. ✓ Keep records of the dates and amounts of onsite Freon recycling. ✓ Manage filters from Freon recovery equipment as hazardous waste.	✖ Evaporate or vent Freon. This is illegal.
PAINT	✓ Mix paint only as needed and only as much as needed. Use digital scales if possible. ✓ Reuse paint recycling sludge as a rough coat for other applications, such as undercoating. ✓ Apply tinted primers to reduce basecoat usage. ✓ Separate waste paint and paint sludges from waste thinner. ✓ Reduce paint cup size on spray guns to reduce amount of wasted paint.	✖ Mix waste paint with other waste.
PAINT SOLVENTS AND THINNERS	✓ Place all waste paint solvent in a drum labeled "WASTE PAINT SOLVENT" and "HAZARDOUS WASTES." ✓ Make sure solvent is actually too dirty to use anymore before placing in waste container. ✓ Consider purchasing a spray gun cleaning unit that recirculates solvent. This reduces the amount of solvent used and the amount of waste solvent generated. ✓ Consider purchasing your own solvent still and recycling solvent onsite for re-use. (Remember: still bottoms and sludges are hazardous waste, but this approach can substantially reduce the amount of hazardous waste you generate.) ✓ Decant waste thinner for reuse as a precleaning solvent for spray guns and other equipment, then use a small amount of fresh solvent for final cleaning. Paint thinners may be prolonged by using multiple cleaning	✖ Dispose of spent solvents to drains, the air or the ground. ✖ Mix paint solvents with other waste. ✖ Evaporate solvents as a means of disposal. ✖ Place sludges from solvent stills in the garbage.

Material	DO:	DON'T:
	steps, which may reduce spoilage of "clean" thinner baths. Waste thinners may also be recycled for use as a precleaning step for parts cleaning. ✓ Keep the container closed when not in use to avoid evaporation. ✓ Keep different types of solvents in separate, labeled, closed containers	
PAINT SPRAY BOOTH FILTERS	✓ Always use spray booth filters. Reusable metal or Styrofoam paint booth filters are best. ✓ Always make sure that the filters are installed properly and cover all openings. ✓ Consider using cheaper pre-filters to prolong the life of filters. ✓ Change filters only when needed. ✓ If you use lead-based paints, make a hazardous waste determination so you know whether you have to dispose of spray booth filters as hazardous waste. (See Section 3, pages 3-4 to 3-6 for more information.) ✓ Non-hazardous filters can be disposed of with the solid waste if OK with your waste hauler.	✘ Use a spray booth without a filter. ✘ Use a spray booth with the wrong type of filter. ✘ Dispose of spray booth filters used with lead-based paint until you have made a hazardous waste determination.
SHOP TOWELS	✓ Use cloth towels that can be cleaned and reused. ✓ Use less hazardous cleaning solvents (ones without chlorinated compounds) when possible. ✓ Use a commercial laundry/recycling facility that is meeting local sewer discharge limits. ✓ Keep waste shop towels in a closed container marked "CONTAMINATED SHOP TOWELS ONLY".	✘ Throw dirty towels into your dumpster. ✘ Saturate towels. If you do, wring them out and reuse the liquid or dispose of the liquid properly. ✘ Use disposable paper towels or rags if you can avoid it. ✘ Dispose of solvents by pouring them into containers of used shop towels. ✘ Use a laundry facility or recycler that discharges its wastewater to a drain field (septic tank).

Material	DO:	DON'T:
SPRAY CANS	✓ Consider phasing out spray cans in your shop. ✓ When you are using up a spray can, turn it upside-down to keep the nozzle from clogging. ✓ Use up an entire spray can before starting another. ✓ If a spray can malfunctions (for example, the tip breaks off), handle as hazardous waste or consider returning it to your supplier. ✓ Empty spray cans are considered hazardous waste unless punctured (in a commercially available spray can puncturing device) and the empty cans are recycled as scrap steel/metal. ✓ Any filters associated with a spray can puncturing device may be hazardous waste. ✓ The liquids collected within the spray can puncturing device or associated container may be hazardous waste.	✘ Throw any spray cans into the dumpster. ✘ Empty the can by just spraying it into the air without actually using the product.
FUEL FILTERS	✓ Accumulate used fuel filters in a separate, marked, fireproof container. ✓ Determine through testing if your fuel filters are hazardous, and dispose of them accordingly.	✘ Put used fuel filters in the dumpster, because they may be considered hazardous.
TRANSMISSION FILTERS	✓ Remove oil by draining for 24 hours. ✓ Keep drained filters in a container marked "USED TRANSMISSION FILTERS ONLY" and locate an oil filter recycler who will take them. ✓ Put oil drained from filters in your "USED OIL ONLY" container.	✘ Put any filters in the dumpster.

Material	DO:	DON'T:
USED ENGINE OIL; TRANSMISSION FLUID; AND OTHER USED OILS	✓ Keep used oil in a separate container marked "USED OIL ONLY". ✓ Place your container in a secure area and train your workers to keep it secure. ✓ Make sure used oil is tested to be "on spec" if you receive (or give) oil for burning from another business. ✓ Keep records of used oil testing and shipments. ✓ Used oil burned in a space heater that is owned by the generator on-site and burning only their own generated used oil or from off-site that meets the specifications established under 40 CFR Part 279. ✓ If you have waste oils and fluids you cannot recycle and you must discard, use licensed disposal contractors. **For more information, contact Steve Coe at (804) 698-4029 or http://www.deq.virginia.gov/recycle/usedoil.html**	✘ Dispose of used oil to a storm drain, septic tank, dry well, sewer or dumpster. ✘ Contaminate used oil by mixing it with even small amounts of brake cleaner or carburetor cleaner. This could turn the whole load into a hazardous waste. ✘ Pour used oil on the ground, even for dust suppression. ✘ Mix used oil with incompatible wastes such as used antifreeze. ✘ Mix your used oil or "do-it-yourselfer" used oil with any other waste if you plan to burn it in your shop for heating.
USED OIL FILTERS	✓ Remove oil by puncturing filter and draining for 24 hours. ✓ Keep drained filters in a separate container marked "USED OIL FILTERS ONLY". ✓ Put oil drained from filters into your "USED OIL ONLY" container. **Collections sites are listed on http://www.deq.virginia.gov/recycle/usedoil.html or contact Steve Coe at (804) 698-4029**	✘ Put any filters in the dumpster.

Material	DO:	DON'T:
WASTEWATER	✓ Avoid contaminating water with shop waste. Close off all drains leading to storm sewers, dry wells, or septic systems. ✓ Get permission from your local sewer utility before any wash water enters the sewer. ✓ Use dry methods, like sweeping and vacuuming, to clean your shop floor. ✓ Catch leaks before they hit the floor and place in an appropriate waste container. ✓ Clean up small, non-hazardous spills immediately with absorbent. Sweep and save for reuse until absorbing ability is gone. ✓ Use absorbent pads and wring out to appropriate waste container when saturated.	✖ Use absorbents to clean up hazardous wastes (like chlorinated solvents) and then dispose to the dumpster. These absorbents must be properly disposed of as hazardous wastes. ✖ Let wastewater go to an outside or inside storm drain or dry well.

1.2 Recycling auto body shop materials

Only state and federal requirements for recycling relate to servicing air conditioners. Other recycling practices can also save you money while helping protect the environment.

REQUIREMENTS FOR RECYCLING

You must recycle Freon (chlorofluorocarbons, or CFCs) from air conditioning units:

Do:

- ✓ Recycle refrigerant for reuse on-site or send recovered refrigerant to an EPA-approved reclaimer.
- ✓ Use EPA-approved equipment for recycling. For more information and detailed fact sheets, call EPA Stratospheric Ozone Hotline at 1-800-296-1996.
- ✓ Review additional requirements for handling Freon/CFCs in Section 2.8 of this workbook.

The best management practices below list some additional good ideas for recycling.

GOOD IDEAS

Do:

- ✓ **Consider purchasing a solvent recycler.** If your shop generates large quantities of spent spray gun cleaning solvent, then you may be losing money if you don't have a solvent recycling system. For example, suppose your shop generates 15 gallons per week (780 gallons per year) of waste solvent with $5 per gallon purchase cost and $9 per gallon disposal cost. Then a $3,700 solvent recycling system (with a 90% recovery rate) would save you more than $5,000 in the first year alone. Using a solvent recycler may also help you reduce your hazardous waste use, which may give you a better hazardous waste generator status with fewer regulatory requirements. See Appendix 12 for Loan Fund information.
- ✓ **Recycle/reuse antifreeze.** You can filter and reuse antifreeze yourself, or send it off to a recycling service. Remember that filters and other recycling by-products may be hazardous waste.
- ✓ **Recycle car batteries.** You can often get paid a small sum (about $5) for each battery you recycle. And if you recycle batteries they will not be considered hazardous waste. But you must make sure you store your batteries correctly (in a secure, covered location) and check them for leaks. Send them off to a reclaimer at least every six months.
- ✓ **Recycle used oils and oil filters.** You may be able to obtain information about oil recycling from the National Oil Recyclers Association (NORA) at (703) 753-4277 or http://www.noranews.org. **Check http://www.deq.virginia.gov/recycle/usedoil.html or contact Steve Coe at (804) 698-4029**.
- ✓ **Recycle fluorescent/high-intensity discharge lamps.** See Appendix 11 for a list of recyclers. Note that even if you send your lamps for recycling, they may still be classified as hazardous waste, so you should handle them according to the guidelines in Section 3.
- ✓ **Recycle computer systems and monitors, or donate for reuse.** Computer systems and monitors contain components that must be managed as hazardous waste if they are disposed of. **Contact DEQ's Steve Coe at (804) 698-4029 or go the web site at http://www.deq.virginia.gov/ecycling/ for more information about organizations/companies that may recycle or reuse your computer systems/monitors.** Your donation may be tax deductible.
- ✓ **Recycle metals, plastics, glass, paper and cardboard.** You might want to use a trash compactor to compress cardboard and waste paper for offsite recycling.
- ✓ **Purchase used materials or items made of recycled material where you can.**

1.3 Energy efficiency

Saving money is important to all businesses, but especially small businesses. One strategy for maintaining a competitive business is energy management. Managing your energy usage can help decrease energy demand and pollution generation while it saves your business money.

Helping the environment is great, but increasing your bottom line is even better, right? Well, the following Energy Conservation Good Ideas will help you to conserve Virginia's precious natural resources AND increase your profits.

GOOD IDEAS

Do:

- ✓ **Keep garage doors closed to save on heating and cooling expenses.**
- ✓ **Repair leaks and properly maintain compressed air systems.** Leaks cost money.
- ✓ **Use spray booths or prep stations that are insulated and recirculate air to avoid the expense of heating so much outside air.**
- ✓ **Turn off lights and equipment when they are not in use.**
- ✓ **Use programmable thermostats or adjust thermostats when a space is unoccupied.** Why pay to heat and cool unoccupied space?
- ✓ **Use fans to improve air circulation and employee comfort, instead of turning that thermostat down another degree.** Each degree of higher temperature can save you about 3 percent on cooling costs.
- ✓ **Replace incandescent light bulbs with compact fluorescent bulbs, which last much longer and use much less energy.** Compact fluorescent bulbs cost about 75 percent less to operate, and last about 10 times longer. They also run cooler, lowering air conditioning expense.
- ✓ **Consider upgrading your fluorescent lighting system.** Up-to-date fluorescent lights with electronic ballasts use less power and avoid the hum and flicker of older systems.
- ✓ **Clean or replace air filters in your heating and cooling systems, every three months, or monthly during peak heating and cooling periods**.
- ✓ **Caulk and weather-strip windows and exterior doors to prevent leaks.**
- ✓ **Install motion-sensor lighting in areas used infrequently, such as bathrooms or break rooms.**
- ✓ **Buy ENERGY STAR qualified office equipment, HVAC systems, refrigerators, and other products when needed.** For a complete listing of products, go to http://www.energystar.gov/products.
- ✓ **Partner with the ENERGY STAR for Small Business program**. It's free and they provide you with unbiased information and support. (It also projects a great image to your customers!) Go to http://www.energystar.gov/smallbiz for more information.
- ✓ **Get help from the Virginia Information Source for Energy (VISE). Visit http://www.deq.virginia.gov/p2/vise/homepage.html or call Keith Boisvert at VISE at (804) 698-4225 to find more energy saving advice.**

1.4 Housekeeping for auto body shops

GOOD IDEAS

Do:

- ✓ Keep your floor clean and dry.
- ✓ Collect all unused paints for reuse or proper disposal.
- ✓ Make sure spill cleanup equipment is well marked and easily available at all times.

- ✓ Prevent spills from reaching the floor.
- ✓ Use secondary containment for all chemicals, including paints, thinners, strippers, cleaners and automotive fluids. This means that if the waste container leaks, there will be a second container to hold the spill.
- ✓ Install drip pans and trays throughout the shop (e.g., under vehicles and wherever liquids are transferred.
- ✓ Clean up spills immediately:
  - **o** Use rags for small spills. Workers should carry rags for that purpose then properly dispose of the used rags.
  - **o** For larger spills:
    - Use a "hydrophobic mop" if available (one that only absorbs oil, not water).
    - Transfer used oil to a drum for recycling.
    - Use a cloth mop to mop up any antifreeze.
    - Transfer antifreeze to a drum for recycling.
    - Use rags to dry the floor; once floor is dry, then wet mop.
- ✓ Use less water:
  - **o** Consider using a wastewater collection system to collect and recycle car wash water.
  - **o** Make sure hose bibs are water-tight and water is not leaking from valves or fixtures.
- ✓ Keep good records

Don't:

- ✖ Hose down work areas. Hosing creates a lot of extra industrial wastewater.
- ✖ Leave sprayers or hoses running when not in use.

1.5 Reporting releases of petroleum products or chemicals

The State of Virginia requires that your shop report any releases to the environment of petroleum products and chemicals like solvents contained in paint thinner and paints. You can report releases by calling the DEQ Pollution Response Program Representative in the NVRO Regional Office at (703) 583-3864.

When you are finished reading this section, you should be able to answer the following questions on the Auto Body Self-Certification Form:

1. Has your shop had any releases of petroleum products or chemicals to the environment in the last 12 months?
2. If yes, have you reported those releases to DEQ Northern Virginia Regional office at (703) 583-3864?

Any petroleum product, paint, or paint thinner that leaks into surface water or groundwater must be reported. This includes releases to asphalt or concrete surfaces that drain to storm sewers or surrounding soil. Small discharges or releases inside a building are exempt from reporting if the

discharge does not immediately or eventually result in a release to the outside environment. That means small spills of paint, paint thinner or petroleum products inside a building, appropriately cleaned up, are exempt from reporting.

REQUIREMENTS FOR REPORTING RELEASES

You must report all releases of petroleum products and chemicals to the environment. This means you:

Do:

- ✓ If you have a spill or discharge of a petroleum product from an Underground Storage Tank (UST) or an Above Ground Storage Tank (AST) that is 25 gallons or less which does not reach state waters and the spill is cleaned up immediately you must keep a written record the spill. If it reaches state waters and is less than 25 gallons and does not cause a sheen on the surface of the water it must be cleaned up with in 24 hours.
- ✓ If you have a spill of solvent in your shop that is less than 1000 lbs which does not contact a drain you should clean it up immediately, taking necessary precautions for your employees, protective gloves, inhalation protection etc. You should also keep a record of the spill name of solvent, quantity, location of spill time and date.
- ✓ If your spill is above the limits indicated above or you are not sure you should report the release by calling the DEQ NVRO Regional Office at (703) 583-3864 and reporting the substance and approximate quantity spilled.

- ✓ Prevent spills from reaching the floor:
  - o **Use secondary containment for all chemicals, including paints, thinners, strippers, cleaners and automotive fluids.** This means that if the waste container leaks, there will be a second container to hold the spill.
  - o Install drip pans and trays throughout the shop (e.g., under vehicles and wherever liquids are transferred).
  - o Use funnel drum covers to minimize spills when transferring liquid.
  - o Install bulk, pressurized, overhead fluid delivery systems.

Section 2:

Air Pollution

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2.1 Introduction to air pollution

When you think of air pollution, the first thing that generally comes to mind is smoke billowing from factory smokestacks. However, air pollution can be generated in many ways.

Air pollution from auto body shop operations mainly comes from three activities: surface preparation, surface coating, and cleanup. These activities generate four major types of air pollutants that might impact human health and the environment, if they are not controlled properly:

1. Volatile organic compounds (VOCs);
2. Hazardous air pollutants (HAPs);
3. Dust (particulates) from sanding and painting; and
4. CFCs/HFCs from motor vehicle air conditioning refrigerants.

Volatile Organic Compounds and Hazardous Air Pollutants

Most paints, surface preparation solutions, and solvents used for mixing paint and cleaning equipment contain VOCs and HAPs. VOCs are non-water liquids that evaporate. When VOCs evaporate into the air and combine with sunlight, they produce ground-level ozone (otherwise known as "smog"), which can worsen asthma, damage lung tissue, and contribute to serious respiratory illness. Ozone can also damage agricultural crops. Air pollutants that have been determined to be quite harmful to humans have been designated by Congress as Hazardous Air Pollutants (HAP's). Some HAPs can cause immediate irritation and harm when touched, eaten, or inhaled, others can cause longer term damage such as cancer, lung disease, skin condition, neurological disease, and birth defects. Some chemicals that are HAPs are also regulated by OSHA and state agencies under occupational health and safety rules. The majority of HAP's are VOC's. HAP's that are not VOC's are particulates.

Dust (Particulates) from Welding, Sanding and Painting

Dust comes from welding, sanding activities (sanding dust) and over-spray from spray painting (painting dust). Welding fumes/dust and sanding dust can contain toxic metals, such as lead, arsenic, cadmium and chromium, and is considered dangerous to workers and people in your community. These toxic metals are examples of particulates that are considered Hazardous Air Pollutants. Potential adverse health effects from dust might be aggravating diseases like asthma and bronchitis. Exposure can come from breathing the dust, getting the dust in food, or bringing the dust home on clothes so others might be exposed.

CFCs/HFCs from Motor Vehicle Air Conditioning Refrigerants

Air conditioning refrigerants, such as R-12 (CFC-12, Freon®), and R-134a (HFC-134a), which are found in vehicle air conditioners are also regulated chemicals. In this case the chemicals are chlorofluorocarbons (CFC) and hydroflurocarbons (HFC), and are directly regulated by the US Environmental Protection Agency. If CFCs or HFCs evaporate or vent from your shop, they rise into the upper atmosphere and destroy the ozone layer. The ozone layer protects the earth from ultraviolet (UV) radiation. The potential increase in the amount of UV radiation increases the risk of skin cancer and other damage to humans, plants and animals.

To minimize the environmental and health impacts of your business to your workers and community, your shop should take steps to keep these air pollutants (VOCs, HAPs, sanding dust and CFCs/HFCs) under control.

This Section will help you:

- **Register your facility;**
- **Control dust from sanding and painting activities;**
- **Reduce fumes from paints and solvents;**
- **Identify efficient painting techniques;**
- **Properly clean spray guns and equipment;**
- **Repair and replace vehicle air conditioning systems;**
- **Meet requirements on record keeping and employee training; and**
- **Meet requirements to prevent or reduce air pollution.**

When you are finished reading this section, you should be able to answer the following questions on the Auto Body Self-Certification Checklist:

- Based on the way your shop operates, would it be **possible** for your shop to do more than **50** auto body jobs per week? The answer to this question will tell you if your shop may be subject to additional regulatory requirements.
- Do you take reasonable precautions to prevent any airborne sanding or painting dust (i.e., fugitive dust) from leaving the building?
- Does your shop use a ventilated sander?
- Does your shop store cloth and paper, or other absorbent applicators, moistened with coatings, solvents, or cleaning solvents in closed, non-absorbent, non-leaking containers?
- Does your shop only use coatings that comply with state and federal VOC content limitations and are designed for automotive painting purposes?
- Does your shop employ a manufacturer approved training program in the proper use and handling of coatings, solvents, and waste products to minimize air emissions?
- Do you always follow manufacturers' instructions for mixing coatings, to avoid over-diluting paints with solvents?
- Does your shop use methylene chloride-based paint strippers?
- Do your painters and technicians use only painting techniques allowed by Virginia's regulation?

- Are all refinishing operations carried out in an approved work area (spray booth and prep station)?
- Does your shop clean the spray guns using only the methods allowed by Virginia's regulation?
- Does your shop use detergents, high-pressure water, or other non-VOC cleaning options to clean coating lines and containers when practical?
- Have all your employees who handle refrigerants (like CFCs/HFCs) from air conditioners been trained and certified by an EPA-accredited program?
- Is the equipment being used also approved/certified by EPA?
- Does your shop maintain all required records?

2.2 Determining whether your shop is a major or minor source of air emissions

Within the Northern Virginia area there is the Northern Virginia Volatile Organic Compound Emissions Control Area. All auto body shops that are within this emissions control area (see below) are required to register as explained in **Section 2.3**.

Northern Virginia Volatile Organic Compound Emissions Control Area

Alexandria City	Arlington County
Fairfax City	Fairfax County
Falls Church City	Loudoun County
Manassas City	Prince William County
Manassas Park City	Stafford County

In addition to the registration a permit may be needed if your shop is classified as a "major" source. The permit requirements you would then have to meet would be based upon the amount of VOCs and HAPs that your shop generates. If your shop is classified as a "minor" source of VOCs and HAPs an Auto Body Air Registration is all that will be required (See **Appendix 2**).

How to tell if your shop is a major or minor source:

- **If your shop is unable to do more than 50 auto body jobs per week**, your shop is considered to be a **minor source**.
- **If you *could* do more than 50 jobs per week** (even if you don't actually do this many jobs) your shop may be a **major source**.
- To determine whether your shop is a major source read **Appendix 2**. If you are still unsure call the NVRO DEQ Air Permit Manager, Terry Darton, at (703) 583-3845.

2.3 Registering your shop in Virginia

All auto body shops that participate in the Auto Body Self-Certification Program should submit a **registration form** by **January 9, 2006**.

This section of the workbook describes how to register your facility.

To Register your Facility: Fill in and submit the registration form found in Appendix 1 to the NVRO Regional office:

Department of Environmental Quality
Air Permit Program (Auto Body Project)
13901 Crown Court
Woodbridge, VA 22193

2.4 Controlling dust (particulates) and odor from sanding and painting

If your shop uses hand sanding or mechanical sanders to remove paint and body filler from cars, chances are good that dust (particulates) generated from sanding can travel outside your shop. Refinishing operations as well as welding can also create dust and odors that can be harmful or offensive to your customers, workers and neighbors.

This section contains information on what you must do to comply with the air pollution regulations. It also contains best management practices that are good ideas and can save your money.

REQUIREMENTS FOR CONTROLLING DUST FROM SANDING AND PAINTING OPERATIONS
You must take reasonable precautions to prevent sanding dust from leaving your shop. **Do:** ✓ Utilize adequate containment methods, such as a ventilated sander, dust collection system, or sanding enclosures, etc. **Don't:** ✖ Create nuisance outside your shop with an odor from your body and painting operations. ✖ Allow any fugitive dust to leave the shop.

In addition to the requirements above, try to implement the following best management practices (BMPs). They are good ideas to help reduce and control fugitive dust from sanding and painting activities.

GOOD IDEAS

Points covered on the self-certification checklist are shown in **bold.**

Do:

- ✓ Use a dust collection system for controlling dust from mechanical sanders
    - o **Use a ventilated sander (dustless vacuum) system.** Vacuum units are the best dust-controlling devices — they can control up to 90% of dust generated from sanding operations.
- ✓ Use room ventilation and filtration equipment in addition to dust collection systems to keep dust from escaping the shop.
- ✓ Keep sanding operations separate from the rest of your shop. Close shop doors and windows (if your shop has proper ventilation systems), to keep dust from blowing out of your shop.
- ✓ Ensure that your workers wear overalls, gloves, goggles, and respirators to reduce the amount of dust exposure.
- ✓ Repair minor dents or dings by the paint-less dent removal (PDR) technique. PDR is a purely mechanical process that uses special tools to restore sheet metal back to its original form by removing small dents, creases, and surface imperfections without the need for repainting.

- ✓ Inspect sanding equipment often. Make sure all collection systems, such as vacuum sanding units, are operating properly with no leaks or blockages in the system.

2.5 Reducing fumes, VOCs, and HAPs from paints and solvents

Surface preparation for auto body work involves the use of solvents for wiping the auto body surface and for removing old paint prior to applying coatings. The solvents often contain HAPs and VOCs. Paints and thinners also contain HAPs and VOCs that evaporate into the air. Because solvents, paint strippers, paints, and thinners can cause dangerous air pollution, state and federal regulations require that you take steps to minimize risks to your workers and the community.

This section contains information on what you must do to comply with the regulations. It also contains best management practices that are good ideas and recommended for minimizing the fumes from the use of paints and solvents, but are not necessarily required by regulation.

REQUIREMENTS FOR REDUCING FUMES FROM PAINTS AND SOLVENTS

You must take measures to minimize fumes generated from use of paints and solvents.

Do:

- ✓ Store fresh and used coatings, thinners, and solvents in non-absorbent, non-leaking containers with closed lids and labeled.
- ✓ Keep containers for fresh and used coatings, thinners, and solvents closed (lids on and labeled) at all times except when filling or emptying.
- ✓ Store cloth and paper, or other absorbent applicators, moistened with coatings, solvents, or cleaning solvents in closed, non-absorbent, non-leaking containers.
- ✓ Mix paints ONLY according to manufacturers' instructions. Avoid over-diluting.
- ✓ If you use cold solvent cleaners, only purchase solvents with a vapor pressure of 1 mmHg at 68^{O}F. Check with your solvent supplier to find out the vapor pressure of the solvents you buy. You can also find vapor pressure information on the products' Material Safety Data Sheets (MSDS), but be sure that the vapor pressure given is for 68°F.
- ✓ Only purchase coatings that comply with VOC content limits found in Table 4-48A below (Virginia's Regulation 9VAC 5-40-6990.A.)

Allowable Content of VOCs in Paints and Coatings (as applied)
Weight of VOC per Volume of Coating (minus water and non-VOC solvents)

Coating Type	Limits	
	Pounds per gallon	Grams per Liter
Automotive pretreatment primer See Formula #1	6.5	780
Automotive primer-surfacer See Formula #1	4.8	575
Automotive primer-sealer See Formula #1	4.6	550
Automotive topcoat:		
single stage-topcoat (See Formula #1)	5.0	600
2 stage basecoat/clearcoat (See Formula #2)	5.0	600
3 or 4-stage basecoat/clearcoat (See Formula #2)	5.2	625
Automotive Multi-colored Topcoat See Formula #2	5.7	680
Automotive specialty	7.0	840

In order to be able to document that your paints and coatings meet the regulatory VOC thresholds found above you may have to calculate the VOC content of the paints and coatings you use. Below are instructions on how to calculate the VOC content using the formulas found in the regulation. **The Paint and Coating Center online calculator at http://www.paintcenter.org/newcalc.cfm may be used but be sure to use VOC Calculator #1 or Calculator #2.**

Formula # 1 to calculate VOCs for individual coatings:

$$VOC = \frac{(Wv - Ww - Wec)}{(V - Vw - Vec)}$$

where:

VOC = VOC content in grams per liter (g/l) of coating less water and non-VOC solvents;

Wv = Weight of total volatiles, in grams;

Ww = Weight of water, in grams;

Wec = Weight of exempt compounds, in grams;

V = Volume of coating, in liters;

Vw = Volume of water, in liters; and

Vec = Volume of exempt compounds, in liters.

To convert from grams per liter (g/l) to pounds per gallon (lb/gal), multiply the result (VOC content) by 0.008345 or by 8.345×10^{-3} if you have a scientific calculator.

Instructions for Formula # 1

1. **Check the list of constituents of the coating. In most cases, this should be available on the container label or in an accompanying Material Safety Data Sheet (MSDS) sheet. If not, contact the manufacturer. The list should show the amount of each constituent.**

2. **From the label or MSDS sheet find the amount (in grams) of "volatiles" *in the coating*. If the volatiles content is only given as a percentage, you will have to multiply the mass (weight) of the total coating by the percentage that is volatile. (One pound equals 453.6 grams.)**

3. **Subtract from the given total volatiles amount the amount of volatiles considered to be exempt compounds. Exempt compounds are listed in the table below. If none of the compounds listed below are named on the label or MSDS sheet, assume they are not in the compound. The manufacturer may simply state the total amount of "exempt" compounds. It is possible that you will not be subtracting any exempt compounds.**

4. **Also, subtract the amount of water shown as being in the coating. Water is a volatile, but not a VOC.**

5. **Call the amount (in grams) of volatiles remaining after Steps 3 and 4 the "mass of VOC."**

6. **From the label or by other means find the total volume (in liters) of the coating. (One gallon equals 3.79 liters.)**

7. **From the volume of the coating subtract the volume of exempt compounds.**

8. **Also, subtract the volume that is water.**

9. **Call the volume (in liters) of coating after Steps 7 and 8 the "applicable volume of coating."**

10. **Divide the "mass of VOC" from Step 5 by the "applicable volume of coating" from Step 9 to determine the VOC content for compliance and record keeping purposes.**

Formula # 2 to calculate VOCs for a multi-stage topcoat:

$$VOCmulti = \frac{VOCbc + \sum_{i=0}^{M} VOCmci + 2(VOCcc)}{M + 3}$$

where:

aVOCmulti = VOC content of multistage topcoat, g/l

bVOCbc = VOC content of basecoat, g/l

cVOCmci = VOC content of the midcoat(s), g/l

VOCcc = VOC content of the clear coat, g/l

M = number of midcoats

To convert from grams per liter (g/l) to pounds per gallon (lb/gal), multiply the result (VOC content) by 8.345 x 10^{-3} (lb/gal/g/l).

Instructions for Formula #2:

To calculate the VOC content of a multi-stage topcoat for recordkeeping purposes and compliance with the limit on grams per liter of VOC for a "2-stage" or "3 or 4-stage basecoat/clearcoat" shown in Table 4-48A, do the following:

1. **Add together the VOC contents in grams per liter (g/l) of each midcoat and call that total "Midcoat VOC." Note how many different midcoats are used? Skip this step if it is a "2-stage" topcoat, because there are no midcoats.**
2. **Add 3 to the number of midcoats and call the total the "Number of Coats," even if you actually apply a different total number of coats for the job.**
3. **Multiply the VOC content in grams per liter (g/l) of the clear coat by 2 and call the result the "Clear Coat VOC."**
4. **Now add together the Midcoat VOC plus the Clear Coat VOC plus the VOC content in grams per liter (g/l) of the Base Coat. Call the total of these three numbers the "Total VOC."**
5. **Lastly, divide the "Total VOC" by the "Number of Coats" to get the VOC content of the multi-stage topcoat finish.**

Note: You do not consider the amount of each coating used in this calculation, only the amount of VOC per liter of coating used.

Table of Exempt Compounds for VOC Calculations
(from regulation 9 VAC 5-10-20)

a. Methane;	z. 1,3-dichloro-1,1,2,2,3-pentafluoropropane (HCFC-225cb);
b. Ethane;	aa. 1,1,1,2,3,4,4,5,5,5-decafluoropentane (HFC 43-10mee);
c. Methylene chloride (dichloromethane);	bb. Difluoromethane (HFC-32);
d. 1,1,1-trichloroethane (methyl chloroform);	cc. Ethylfluoride (HFC-161);
e. 1,1,2-trichloro-1,2,2-trifluoroethane (CFC-113);	dd. 1,1,1,3,3,3-hexafluoropropane (HFC-236fa);
f. Trichlorofluoromethane (CFC-11);	ee. 1,1,2,2,3-pentafluoropropane (HFC-245ca);
g. Dichlorodifluoromethane (CFC-12);	ff. 1,1,2,3,3-pentafluoropropane (HFC-245ea);
h. Chlorodifluoromethane (H CFC-22);	gg. 1,1,1,2,3-pentafluoropropane (HFC-245eb);
i. Trifluoromethane (H FC-23);	hh. 1,1,1,3,3-pentafluoropropane (HFC-245fa);
j. 1,2-dichloro 1,1,2,2,-tetrafluoroethane (CFC-114);	ii. 1,1,1,2,3,3-hexafluoropropane (HFC-236ea);
k. Chloropentafluoroethane (CFC-115);	jj. 1,1,1,3,3-pentafluorobutane (HFC-365mfc);
l. 1,1,1-trifluoro 2,2-dichloroethane (HCFC-123);	kk. Chlorofluoromethane (HCFC-31);
m. 1,1,1,2-tetrafluoroethane (HFC-134a);	ll. 1 chloro-1-fluoroethane (HCFC-151a);
n. 1,1-dichloro 1-fluoroethane (HCFC-141b);	mm. 1,2-dichloro-1,1,2-trifluoroethane (HCFC-123a);
o. 1-chloro 1,1-difluoroethane (HCFC-142b);	nn. 1,1,1,2,2,3,3,4,4-nonafluoro-4-methoxy-butane ($C_4F_9OCH_3$);
p. 2-chloro-1,1,1,2-tetrafluoroethane (HCFC-124);	oo. 2-(difluoromethoxymethyl)-1,1,1,2,3,3,3-hepta-fluoropropane ($(CF_3)_2CFCF_2OCH_3$);
q. Pentafluoroethane (HFC-125);	pp. 1-ethoxy-1,1,2,2,3,3,4,4,4-nonafluorobutane ($C_4F_9OC_2H_5$);
r. 1,1,2,2-tetrafluoroethane (HFC-134);	qq. 2-(ethoxydifluoromethyl)-1,1,1,2,3,3,3-hepta-fluoropropane ($(CF_3)_2CFCF_2OC_2H_5$);
s. 1,1,1-trifluoroethane (HFC-143a);	rr. Methyl acetate; and
t. 1,1-difluoroethane (HFC-152a);	ss. Perfluorocarbon compounds which fall into these classes:
u. Parachlorobenzotrifluoride (PCBTF);	(1) Cyclic, branched, or linear, completely fluorinated alkanes;
v. Cyclic, branched, or linear completely methylated siloxanes;	(2) Cyclic, branched, or linear, completely fluorinated ethers with no unsaturations;
w. Acetone;	(3) Cyclic, branched, or linear, completely fluorinated tertiary amines with no unsaturations; and
x. Perchloroethylene (tetrachloroethylene);	(4) Sulfur containing perfluorocarbons with no unsaturations and with sulfur bonds only to carbon and fluorine.
y. 3,3-dichloro-1,1,1,2,2-pentafluoropropane (HCFC-225ca);	

In addition to the requirements above, the following best management practices (BMPs) are good ideas to help reduce fumes from paints and solvents.

GOOD IDEAS

Points covered on the self-certification checklist are shown in **bold.**

Do:

- ✓ Use the lowest VOC coatings available.
- ✓ Use coatings that contain no heavy metals, or have the lowest metal contents available.
- ✓ Use water-based primers and keep informed about developments in water-based top coats.
- ✓ Carry out all refinishing operations in a spray booth and prep area to contain paint emissions and over-spray.
- ✓ Shop operations - Use appropriate personal protective equipment such as an air mask when spraying, eye protection, gloves, etc.
- ✓ Do all solvent cleaning, paint stripping, and paint mixing in a ventilated spray booth or prep station. This will minimize release of dangerous fumes.
- ✓ Ensure that ventilation of spray booths and prep stations is exhausted vertically at least six feet above the highest point of the shop's roof.
- ✓ Use detergent or citrus based cleaners instead of solvents to prepare surfaces.

Don't:

- ✗ **Use methylene chloride-based paint strippers.** Methylene chloride is considered a toxic air contaminant, and paint-stripper waste containing this chemical must be handled as hazardous waste.

2.6 Efficient painting techniques

Efficient painting techniques not only can help you reduce air emissions from your shop, they can save you money and improve worker health and safety.

This section contains information on what painting techniques you can use to reduce air emissions from painting and coating.

REQUIREMENTS FOR PAINTING

You must use painting techniques that are approved by DEQ to minimize the amount of painting products evaporating into the air.

Do:

- ✓ **Use only the following coating application techniques:**
  - o Any non-atomized application technique (e.g., flow/curtain coating, dip coating, roller coating, brush coating, cotton-tipped swab application coating, electrodeposition coating, etc.)
  - o High Volume Low Pressure (HVLP) spraying
  - o Electrostatic spray
  - o Airless spray
  - o Other coating application methods that achieve emission reductions equivalent to or greater than those achieved by HVLP or electrostatic spray application methods. DEQ must approve.

- ✓ **Application Techniques Exempt from regulatory requirements:**
  - o Airbrush application methods for graphics, stenciling, lettering, and other identification markings.
  - o An application of coatings sold in nonrefillable aerosol containers; and
  - o Application of automotive touch-up repair finishes materials.

Don't:

- ✖ Use other painting techniques or systems not listed above.

In addition to the requirements above, the following best management practices (BMPs) are good ideas for more efficient application of paints.

GOOD IDEAS

Points covered on the self-certification checklist are shown in **bold.**

Do:

- ✓ **Paint everything in a spray booth using proper air pressures.**

- ✓ Provide training to operators of the HVLP equipment on the proper use and pressure settings of the equipment to minimize over-spray.
- ✓ Follow the manufacturer's instruction for using any refinishing operations to avoid paint waste.
- ✓ Frequently inspect the spray booth filters to ensure that the system does not become clogged and ineffective.
- ✓ Follow the directions on product labels when mixing paints and solvents to minimize the amount of waste generated.
- ✓ Mix only the amount required for the particular painting/coating job, use digital scales.
- ✓ Look into innovative painting methods and equipment such as the laser-based spray painting technology. It increases the efficiency of applying the paint through uniform thickness application. This will save you money by reducing your paint costs by more than a 25%. Contact DEQ's SBAP (804-698-4394) for more information if you are interested in this technology.

2.7 Cleaning spray guns and equipment

Be sure to properly clean all spray guns and your spray booth after each coating application. This ensures proper operation and removes leftover coating products from the coating cup, lines, and nozzle. If you use products for cleaning spray guns and spray booths that contain hydrocarbon-based solvents the cleaning waste must be managed as hazardous waste (see Section 3).

This section contains information on what you must do to comply with the regulations as well as practices that are good ideas but not required for cleaning spray guns and equipment.

REQUIREMENTS FOR CLEANING SPRAY GUNS AND EQUIPMENT

You must clean spray guns properly using the approved methods specified under the Virginia Air regulation.

Do:

- ✓ Use only the following methods to clean spray guns:
  - o An enclosed spray gun cleaning system that is kept closed when not in use. (Enclosed spray gun cleaning machines use less solvent than traditional methods and reduce spent solvent disposal costs.)
  - o An unatomized discharge of solvent into a paint waste container that is kept closed when not in use.
  - o Disassembly of the spray gun and cleaning in a vat that is kept closed when not in use.
  - o Atomized spray into a paint waste container that is fitted with a device designed to capture atomized solvent emissions.

Your coatings and spray gun vendors may be able to provide advice and suggestions.

In addition to the requirements above, the following best management practices (BMPs) are good ideas for cleaning spray guns and equipment.

GOOD IDEAS

Points covered on the self-certification checklist are shown in **bold.**

Do:

- ✓ **Use detergents, high-pressure water, or other non-VOC cleaning options to clean coating lines and containers when practical.**
- ✓ Use a spray gun cleaning system that re-circulates the cleaning solvent and collects the solvent for proper disposal. Only replace and dispose of the recycled cleaning solvent when the solvent cannot clean guns satisfactorily. You can determine when you need to replace the solvent by examining if there are stains on the spray guns after cleaning or if the recycled solvent is not clear.
- ✓ Reuse excess coating.
- ✓ Use disposable coverings (i.e. sprayable booth coatings, plastic film, masking paper) over the interior of paint booth surface in place of solvent-based cleaners for removing paint over-spray and residue. (must be disposed of properly).
- ✓ If use of disposable masking paper is not practical, clean the interior of paint booth surface by scraping along with water-based or low-VOC cleaners.
- ✓ Use a shop rag recycler.

Don't:

- ✘ Use paper towels for cleaning up paints, solvents or thinners, because the paper towels may be considered hazardous waste.
- ✘ Use solvents to clean hands. Solvents can penetrate through worker's skin, enter the blood stream, and ultimately cause health problems.

2.8 Repairing, servicing, and replacing vehicle air conditioning systems

Because of the ozone-depleting nature of air conditioner refrigerants, federal law requires shops that repair, service, or replace air conditioning systems to capture and recycle all refrigerants.

This section contains information on what you must do to comply with the regulations as well as practices that are good ideas but not required for repairing, servicing and replacing a vehicle air conditioning system.

REQUIREMENTS FOR SERVICING, REPAIRING AND REPLACING VEHICLE AIR CONDITIONING SYSTEM

You must properly recover and recycle refrigerants to prevent the release of CFCs/HFCs and similar compounds into the atmosphere when you repair, service, or replace a vehicle air conditioning system.

Do:

- ✓ Make sure your employees who handle refrigerants have been trained and certified by an EPA-accredited program. A list of approved certification organizations can be obtained by calling EPA Stratospheric Ozone Hotline at 1-800-296-1996.
- ✓ Allow only EPA-certified technicians to remove refrigerants.
- ✓ Use only your EPA-certified technician to purchase refrigerants, unless your shop is an EPA authorized reclaiming facility.
- ✓ Recycle refrigerant for reuse on-site or send recovered refrigerant to an EPA-approved reclaimer.
- ✓ Use only EPA-approved/certified recycling/recovery equipment, and label the equipment properly. A list of the EPA-approved/certified equipment can be obtained by calling the Ozone Hotline.
- ✓ Keep a copy of the EPA certification of your equipment and your EPA certification to operate recovery and recycling devices.
- ✓ Maintain records of off-site reclamation, including volume and final destination.
- ✓ Keep all records of refrigerant purchase, sales, on-site recycling, and reclamation for three years.

Don't:

- ✖ Evaporate or vent refrigerants to the atmosphere.

In addition to the requirements above, the following best management practices (BMPs) are good ideas for minimizing the release of CFC to the atmosphere.

2.9 Record-keeping and training

Many coatings, surface-preparation products, and other solvents used in your shop are toxic chemicals. The Virginia air regulation requires you to ensure that your workers have completed training approved by the manufacturer of the coatings. This training must cover the proper use and handling of the coatings, solvents and waste products to minimize the emission of air contaminants. Additionally, keep good purchase and usage records of these products. These records are required and will help you determine your shop's compliance.

This section contains information on what you must do to comply with the regulations as well as practices that are good ideas but not required for record keeping and training.

REQUIREMENTS FOR RECORDKEEPING AND STAFF TRAINING

You must ensure that your workers receive training on what they can do to reduce air emissions.

Do:

- ✓ Maintain training records. Use the manufacturer-approved training program in the proper use and handling of coatings, solvents, and waste products.
- ✓ Maintain the following records at the shop for a period of at least 5 years:
  - o The name, identification number and manufacturer of each coating, reducer, catalyst, surface preparation product, and cleanup solvent used at the shop.
  - o The volume of each coating, reducer, surface preparation product, and cleanup solvent used at the shop each month.
  - o Certified Product Data Sheets showing the VOC content, in pounds of VOC per gallon of material of each coating and surface preparation product used at the shop.

  These records can be used to demonstrate to DEQ and EPA officials that your shop is using compliant coatings in amounts that comply with regulatory thresholds.

GOOD IDEAS

Do:

- ✓ Use your paint supplier/jobber to help you with your record keeping.

Section 3:

Hazardous Waste
Universal Waste
&
Used Oil

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3.1 Hazardous waste determination

Do you generate "hazardous waste"? You may without knowing it. Parts cleaning, painting, and other activities in your shop can produce wastes that are legally defined and regulated as "hazardous waste" under state and federal law. For example, common hazardous wastes in auto body shops include waste paint, sludge (or "bottoms") from solvent recycling stills, or spent solvent. Some raw materials, such as paints, that have expired or that you do not intend to use may also become classified as hazardous wastes.

Under Virginia and federal law, if you generate hazardous waste you have **"cradle-to-grave liability,"** which means you are responsible for your waste even if other companies handle and dispose of it for you. You must determine whether your shop's wastes are classified as hazardous waste and take responsibility for handling and disposing of your wastes properly according to the law.

This section will help you:

- **Identify what types of wastes you generate and whether they are defined as hazardous;**
- **Measure the amount of hazardous waste your shop generates and accumulates; and**
- **Determine your hazardous waste "generator status," which determines the requirements you have to meet in managing your hazardous waste.**

After reading this section, you will know whether your shop is a **"Conditionally Exempt Small Quantity Generator"** (**CESQG**), a **"Small Quantity Generator"** (**SQG**), a **"Large Quantity Generator"** (**LQG**), or not a generator of hazardous waste at all.

When you are finished reading this section, you should be able to answer the following questions on the Auto Body Self-Certification Checklist:

- Does your shop generate any hazardous wastes? (Use the Hazardous Waste Identification Worksheet [pages 3-8 & 3-9] to help you.)
- Have you conducted a complete and accurate hazardous waste determination for each waste stream your shop generates?
- Has your shop in the last 12 months:
  - Identified which wastes you generate?
  - Determined if your waste is classified as hazardous?
  - Recorded the amount of each hazardous waste generated and total amount accumulated on site?
- Has your shop tested potentially hazardous wastes for which a "knowledge-based" determination cannot be made?
- Does your shop track how much total hazardous waste you have on your property at any one time?

- What is your hazardous waste generator status?
- Are you meeting all the requirements for your generator status?

3.1.1 How can you tell if your wastes are hazardous?

This symbol ☞ indicates a written action to be done.

This section will walk you through a step-by-step process of identifying what wastes your shop generates and which of those are "hazardous waste." This worksheet lists all of the common wastes from auto body shops that are or might be considered hazardous waste. Each of the three steps in this section will instruct you how to fill out one of the columns in the Hazardous Waste Identification Worksheet. When you have finished all three steps, you should have a list of all of the hazardous wastes you generate and the amount of each one that you generate. With this information in hand, you can turn to Section 3.1.2 to determine your hazardous waste generator status. You should also want to refer to "Appendix 3: Hazardous Waste Identification Assistance Table."

As you read this section, you will need to refer to the Hazardous Waste Identification Worksheet, on pages 3-8 and 3-9.

Step 1: Identify which wastes you generate.

Turn to the **Hazardous Waste Identification Worksheet. On** page 3-8 and 3-9 read down the column on the far left of the worksheet ("Type of Potentially Hazardous Waste"), and look for the types of waste that your shop generates:

☞ Put a check in Column 1 of the Hazardous Waste Identification Worksheet for each type of waste that your shop has generated in the previous 12 months.

Step 2: For each of the types of waste you checked in Step 1, determine whether the waste is classified as hazardous.

You are required to find out if any of the wastes your shop generates are considered hazardous. They are considered hazardous if:

- They are ignitable, corrosive, reactive or toxic. These are classified as "**characteristic hazardous waste",** or
- They are a '**listed hazardous waste**" as listed by the U.S. Environmental Protection Agency. ,or
- They are a "**mixture of a solid waste and a hazardous waste"** that are listed wastes or characteristic wastes. Some examples are: cleaning rags that are wet with toxic solvents, still bottoms from solvent recycling, kitty litter used to clean up a hazardous waste spill, and dirt that has been contaminated with hazardous waste.

Step 2a For each type of waste you checked off in Step 1, look at Column 2, "Is waste classified as hazardous?" Wastes at the top of the table (rows 1 – 18) are always hazardous, so column 2 is already filled in with the answer "YES." **If you only checked off wastes in rows 1-18, you can skip to Step 3.**

Step 2b If you checked off other wastes in rows 19 – 29, where Column 2 is blank, you are generating ***potentially*** hazardous wastes. In these cases, you have to fill out Columns 3 and 4. This involves determining whether your wastes are, in fact, hazardous, and explaining how you made that determination.

For each type of potentially hazardous waste you have generated in rows 19-29, you can determine whether it is hazardous by reviewing Appendix 3. Appendix 3 shows the list of potentially hazardous waste that are listed in the Hazardous Waste Identification Worksheet, explains the ingredients and hazardous characteristics of each type of waste, and tells you how you can determine if a potentially hazardous waste (those marked "maybe") is, in fact, hazardous.

☞ **Step 2c For each type of potentially hazardous waste** you have generated in the previous 12 months (rows 19-29 that have a check in Column 1), review Appendix 3 and then:

Mark down "Yes" in Column 2 if you have determined the waste is, in fact, hazardous.
Mark down "No" in Column 2 if you have determined the waste is not hazardous.

For each potentially hazardous waste you generate, you also must explain *how* you made the waste determination. For example, you can determine whether your wastes are hazardous through your knowledge of process and materials, by reviewing Materials Safety Data Sheets (MSDSs), or by testing a representative waste sample.

☞ **Step 2d For each type of potentially hazardous wastes you have generated** in the previous 12 months, write down in Column 3 the number of the method you have used to determine whether it is hazardous:

Mark down "1" if you determine the waste as hazardous by using your knowledge of process and materials

Mark down "2" if you have reviewed the MSDS or the product label for ingredients and for warning of dangerous characteristics (e.g., ignitability, corrosivity, reactivity, and toxicity)

Mark down "3" if you have tested a representative sample of the waste **(TCLP test [Toxicity Characteristic Leaching Procedure] – see EPA TCLP Questions at http://www.epa.gov/SW-846/faqs_tclp.htm).**

Mark down "4" if you have used other methods, such as consulting your hazardous waste management vendors or asking DEQ.

Step 3: Record the maximum monthly amount of each hazardous waste generated and amount of hazardous waste accumulated on site.

☞ **Step 3a For each type of hazardous wastes you have generated**, enter the maximum amount you have generated in any single month within the past 12 months in Column 4 of the Hazardous

Waste Identification Worksheet. The maximum monthly amount should reflect the amount of hazardous waste you generate in peak months. If the number of cars your shop repairs is about the same every month, you can enter the amount of waste you generated last month in Column 4.

If your maximum monthly generation number you are reporting is in gallons, convert it into pounds by multiplying the number by 8.5 for only liquid wastes (see Column 4). For solid wastes weigh the wastes including the container.

☞ **Step 3b For each type of wastes you have generated**, enter the total amount of hazardous waste accumulated on your property at any one time in Column 5. If the accumulation amount you are reporting is in gallons of a liquid convert it into pounds by multiplying the number of gallons by 8.5 (see Column 5). For solid wastes, weigh the waste. **For both liquid and solid wastes include the weight of the container.**

Please note that the conversion factor of 8.5 is only an estimate for liquid wastes provided for the convenience of most shops, and may not be precise enough for your particular shop to determine its generator status. If you are close to the threshold level for any generator status, you will need to use more exact numbers to convert gallons into pounds.. Contact your supplier.

The total weight [including the container] of the shipment of hazardous waste listed on the manifest/bill of laden will determine your classification. Please **call DEQ's Northern Virginia Regional Office at (703) 583-3813**, if you have any questions.

Remember, changes in the materials you use or your shop's procedures may change your waste. If your materials change, re-evaluate your waste by using the Hazardous Waste Identification Worksheet. This will help make sure that you have correctly determined your shop's generator status.

☞ **Step 4** Add the maximum monthly amount generated and accumulated for all of your hazardous wastes in pounds, and enter the total at the bottom of the Hazardous Waste Identification Worksheet (in row 30). If you have not converted amounts into pounds, do so now before you add up the total amount.

3.1.2 Determining your hazardous waste generator status

After you have completed the Hazardous Waste Identification Worksheet, you will know the total maximum monthly amount of each hazardous waste you generate and the total amount accumulated in your shop for each waste.

The maximum amount of hazardous waste you generate in any one month, and the total amount of hazardous waste you have accumulated on your property at any one time, are two key factors in determining your hazardous waste generator status. There is a final consideration in determining your generator status:

- You must consider the amount of acute hazardous waste you have accumulated on site. **Most auto body shops do not have acute hazardous waste, but if you handle solvents with carbon disulfide or pyridine, call the DEQ's Northern Virginia Regional Office at (703) 583-3813 to see if you might be generating acute hazardous waste.**

The following table summarizes the various limits for each of the three categories of hazardous generators:

	CESQG (Conditionally Exempted Small Quantity Generators)	**SQG** (Small Quantity Generators)	**LQG** (Large Quantity Generators)
Maximum Amount of Hazardous Waste Generated in any calendar month	Less than 25 gallons (220 pounds)	25 - 300 gallons (220-2,200 pounds)	More than 300 gallons (2,200 pounds)
Amount of Hazardous Waste Accumulated at any one time	Less than 300 gallons (2,200 pounds)	Less than 1,595 gallons (13,000 pounds)	No limit

Your determination of status will provide the answer to Question C.7 on the Auto Body Self-Certification Checklist.

What to do next:

You are only concerned with your Generator Status disregard the other status'

- **If you are a CESQG**, use Section 3.2 to help you fill out the Auto Body Self-Certification Checklist. Then skip to Section 3.4 and continue reading.
- **If you are an SQG**, use Section 3.3 to help you fill out the Auto Body Self-Certification Checklist. Then continue reading Section 3.4.
- **If you are a LQG**, please contact **DEQ's Northern Virginia Regional Office** at **(703) 583-3813** before continuing. This workbook is not intended for **LQGs**. The Northern Virginia Regional Office will provide you with appropriate information and assistance.
- **If you do not generate any hazardous waste, skip directly to Section 3.4**.

3.1.3 Hazardous waste identification worksheet

		Column 1	Column 2	Column 3	Column 4			Column 5		
	Type of Potentially Hazardous Waste	Is waste generated?	Is waste classified as hazardous?	How did you determine hazardous waste determination?	Maximum Monthly Generation			Total Amount Accumulated On Site at Any One Time		
		Check If YES	**Answer either "YES" or "NO"**	1. Using your knowledge 2. Reviewing MSDS/product label 3. Laboratory testing 4. Other methods	**Gal.**	**X8.5=**	**Lbs.**	**Gal.**	**x8.5=**	**Lbs.**
1	Waste or expired oil- (solvent-) based paint		YES							
2	Sludge or bottoms from a solvent recycle or still that recycles paint gun cleaner or thinner		YES							
3	Sludge or bottoms from parts washers/filters		YES							
4	Sludge or bottoms from coolant or antifreeze filters/stills		YES							
5	Sludge or bottoms from hot dip tanks		YES							
6	Methylene chloride paint sludge stripped from vehicles		YES							
7	Paint thinners		YES							
8	Paint gun cleaning solvent		YES							
9	Solvent Degreasers		YES							
10	Parts washing fluid		YES							
11	Immersion cleaners		YES							
12	Mineral spirits (including petroleum naphtha)		YES							
13	Brake cleaner		YES							
14	Carburetor cleaner		YES							
15	Methylene chloride paint stripper		YES							
16	Mercury switches		YES			**x8.5=**			**x8.5=**	

		Column 1	Column 2	Column 3	Column 4			Column 5		
	Type of Potentially Hazardous Waste	Is waste generated?	Is waste classified as hazardous?	How did you determine hazardous waste determination?	Maximum Monthly Generation			Total Amount Accumulated On Site at Any One Time		
		Check If YES	**Answer either "YES" or "NO"**	1. Using your knowledge 2. Reviewing MSDS/product label 3. Laboratory testing 4. Other methods	**Gal.**	**x8.5=**	**Lbs.**	**Gal.**	**x8.5=**	**Lbs.**
17	Absorbent materials, such as Speedi-Dry, contaminated with hazardous waste		YES			**x8.5=**			**x8.5=**	
18	Waste aerosol cans with residual contents of hazardous materials *(unless punctured/drained and sent for scrap metal recycling)*		YES			**x8.5=**			**x8.5=**	
19	Waste paint booth filters					**x8.5=**			**x8.5=**	
20	Waste masking paper or tape contaminated with paint					**x8.5=**			**x8.5=**	
21	Waste sanding dust					**x8.5=**			**x8.5=**	
22	Oil/water separator sludge									
23	Oil/water separator overflow									
24	Floor wash/rinse waters discharge									
25	Wastewater from a water-based parts cleaner									
26	Electronics/ computers (if not sent for reuse)					**x8.5=**			**x8.5=**	
27	Shop towels/rags contaminated with hazardous waste					**x8.5=**			**x8.5=**	
28	Waste gasoline									
29	Waste coolant/ antifreeze									
30	**Totals** *(sum amounts generated and accumulated)*									

If:

1) the total maximum monthly generation shown above is less than 220 pounds

AND

2) the total amount accumulated on site shown above is less than 2,200 pounds

THEN YOUR SHOP IS A CESOG. If not. review section 3.1.2 for further information.

3.2 CESQGs: How to manage your hazardous waste

Review this section of the workbook if you generate hazardous waste and are a Conditionally Exempt Small Quantity Generator (CESQG).

- ✓ If you do not generate hazardous waste, skip to Section 3.4.
- ✓ If you do generate hazardous waste and are an SQG, skip to Section 3.3.
- ✓ If you are not sure if your shop is a CESQG, review and complete Section 3.1.

This section contains information on the requirements and best practices for managing hazardous waste at a CESQG shop. Each topic provides you with information on what you must do to comply with the regulations as well as best practices that are recommended, but not required, for managing hazardous waste at CESQG shops.

When you are finished reading this section, you should be able to answer the following questions on the Auto Body Self-Certification Checklist:

- ➢ Are all hazardous waste containers properly labeled?
- ➢ Are all containers holding hazardous waste managed to prevent or to minimize accidental releases?
- ➢ Is the accumulation area inspected weekly for signs of spills or container deterioration?
- ➢ Does your shop send all hazardous wastes to a permitted hazardous waste treatment, storage, or disposal facility or a state authorized facility?
- ➢ Does your shop have a program that trains employees who handle hazardous waste in proper waste management procedures?
- ➢ Does your shop have all required records?

3.2.1 Labeling containers

Containers holding hazardous waste must be appropriately labeled. This section will help you comply with labeling requirements.

REQUIREMENTS FOR LABELING CONTAINERS
You must make sure all your hazardous waste containers are properly labeled. This means you: **Do:** Always label all containers and tanks holding hazardous waste with the words "HAZARDOUS WASTE." Hazardous waste containers in satellite accumulation areas should also be labeled either with the words "HAZARDOUS WASTE" or with other words that say what is in the container. A satellite accumulation area simply means a place where you store waste as you work, before you move the waste to a central location in your shop.

In addition to the requirements above, **the following Best Management Practices (BMPs) are good ideas for labeling your hazardous waste containers.**

GOOD IDEAS

Do:

- ✓ In addition to labeling containers with the words "HAZARDOUS WASTE," list the specific contents of each container, such as "WASTE PAINT SOLVENT," on the label.
- ✓ Mark each container with the date that you started storing hazardous waste in that container and the date the container became full.
- ✓ Store each kind of waste in a different container. This will help you avoid putting incompatible wastes in the same container.

3.2.2 Managing containers

Hazardous wastes must be stored in appropriate containers and handled carefully. This section will help you manage and handle your hazardous waste containers to prevent leaks, spills, and explosions.

REQUIREMENTS FOR MANAGING HAZARDOUS WASTE CONTAINERS

You must manage hazardous waste containers to prevent wastes from leaking, spilling, or exploding. This means you:

Do:

- ✓ Always keep container lids and bung holes closed, except when you are filling or emptying the container. If you have hazardous waste tanks, always keep their lids closed.
- ✓ Keep your storage containers in good shape, with no leaks, corrosion, rust, or bulges. If a container is not in good condition or is leaking, transfer the hazardous waste into a container that is in good condition.
- ✓ Open, handle and store hazardous waste containers carefully to prevent the waste from leaking or spilling. Protect them from moving vehicles.
- ✓ Store wastes in containers that are compatible with the waste or use containers with compatible liners, so the wastes will not dissolve, corrode, or react with the container. Steel drums approved by the US Department of Transportation (USDOT) should be used for all paints, thinners, gun cleaners, and paint strippers. Acid wastes should be stored in USDOT approved plastic containers, not metal drums.
- ✓ Separate containers holding wastes that could react with each other.
- ✓ Store rags and any other materials that may have touched solvents or paint strippers in closed, airtight containers. Leaving dirty, solvent-soaked rags lying around can cause a fire or explosion if fumes from the rags come in contact with a spark.

In addition to the requirements above, the following Best Management Practices (BMPs) are good ideas to help prevent hazardous wastes from leaking, spilling, or exploding.

GOOD IDEAS

Do:

- ✓ Separate containers by distance or a physical barrier (like a dike, berm, or wall).
- ✓ Store only one type of hazardous waste in one container. Mixing wastes can cause dangerous reactions. Mixed wastes can be more expensive and difficult to dispose of.
- ✓ Store all containers far enough apart so they can be inspected thoroughly.
- ✓ Store containers inside, protected from the weather.
- ✓ Store containers on a surface that will prevent and contain spills and leaks, such as a small concrete pad with a berm, or a commercially available containment pallet or tray.
- ✓ Properly dispose of hazardous waste containers.
- ✓ Use a ground strap on metal drums to avoid sparks from static electricity.

Don't:

- ✖ Let rainwater accumulate on and around drums.
- ✖ Allow smoking near hazardous wastes.

3.2.3 Accumulating and storing hazardous waste

As a CESQG, you may store a limited amount of hazardous waste at your shop. This section will help you understand requirements for hazardous waste accumulation and storage.

You should have a centralized place for storing hazardous waste in your shop that is secure and protected from the weather. If you generate small amounts of hazardous waste throughout your shop, you may store these wastes close to where you generated the waste, in what are called "satellite accumulation areas." A satellite accumulation area simply means a place where you store waste as you work, before you move the waste to a central location in your shop.

REQUIREMENTS FOR ACCUMULATING AND STORING HAZARDOUS WASTE
To maintain your CESQG status you must stay within the quantity storage limits. **This means you:** **Don't:** ✖ Accumulate more than 300 gallons (2,200 pounds) of hazardous waste on your property. If you store more than this amount, your generator status will change and you will have to comply with additional requirements.

In addition to the above requirement, the following Best Management Practices (BMPs) are good ideas for storing hazardous waste to help prevent leaks, spills, or explosions. Points listed below in **bold** are on the certification checklist.

GOOD IDEAS

Do:

- ✓ **Inspect the accumulation area weekly for signs of spills, container deterioration or improperly sealed containers.** (Suggestion- post the inspection checklist in the accumulation area where it is visible.)
  - ✯ *See Appendix 4 for an example Inspection Checklist.* ✯
- ✓ Maintain inspections records of the accumulation area(s) for 3 years.
- ✓ If your shop has a satellite accumulation area:
  - o **Mark the Satellite Accumulation Area by signs, floor markings, etc.**
  - o Keep each satellite accumulation container closed;

- **o** Keep all satellite accumulation containers in good condition.
- **o** Store less than 55 gallons of hazardous waste at each satellite accumulation area.
- **o** Once you reach the 55-gallon limit, transfer the waste to your central storage place for hazardous waste containers.

✓ Submit information on the shop and its waste accumulation areas to local police, fire departments, local emergency planning committee and hospitals.

✯ *See Appendix 6 for a Sample Letter to Local Authorities.* ✯

Don't:

✖ Ship containers before they are full.

3.2.4 Shipping your waste

For proper disposal all of your hazardous waste must be transported by a permitted hazardous waste hauler to a permitted hazardous waste recycling, treatment, storage or disposal facility. You must keep required records. **This section will help you comply with regulations for shipment of your hazardous waste.**

REQUIREMENTS FOR SHIPPING YOUR WASTE

You must ship all of your hazardous wastes to a permitted hazardous waste facility by a permitted hazardous waste hauler, and you must keep required records. This means you:

Do:

- ✓ Ship your hazardous waste to a permitted hazardous waste recycling, treatment, storage or disposal facility.
- ✓ Only use a hauler with a Virginia Hazardous Waste Transporter Permit to transport your hazardous waste.
- ✓ Keep records of how you disposed of your hazardous waste for at least 3 years. Adequate records include hazardous waste manifests or other documentation, such as bill of ladings, receipts, tolling agreements, or letters of acceptance. The documentation should describe the waste and how much was disposed, where it was disposed, and the date of disposal.

Don't:

- ✖ Dispose of your hazardous waste in a solid waste landfill, municipal waste incinerator, or in a dumpster.
- ✖ Dispose of your hazardous waste at your shop, for example, by flushing it down the drain, pouring into a storm drain, stream, or on the ground.
- ✖ Dispose of your hazardous waste at your shop, for example, by burning it or allowing it to evaporate into the air.
- ✖ Transport your own hazardous waste to another location.

In addition to the requirements above, **the following Best Management Practices (BMPs) are good ideas for shipping hazardous wastes.**

GOOD IDEAS

Do:

- ✓ If your hazardous waste is recycled, and if you and your licensed hazardous waste recycler have a reclamation agreement, keep a copy of the agreement in your records.
- ✓ Check with business colleagues or industry trade associations to help you choose an appropriate hauler or recycling, treatment, or disposal facility to handle your waste. You can also contact the **DEQ's Bob Wickline** for suggestions, at **(804) 698-4213**.

3.2.5 Planning for emergencies

Maintaining safety and emergency equipment and writing down a plan for what to do in case of an emergency can reduce the impact of a spill, fire, or explosion.
This section will help you prepare for emergencies that could occur.

There are no emergency preparedness requirements for CESQGs. However, the following Best Management Practices (BMPs) are good ideas to help you plan and prepare for any emergencies at your shop.

GOOD IDEAS

Do:

- ✓ Keep the following equipment to help your shop be prepared for an emergency:
  - **o** An internal communication system (such as an alarm or intercom);
  - **o** A telephone to call for help;
  - **o** Fire extinguishers, identify locations and conduct annual fire equipment inspections as required by OSHA ,your liability insurance carrier, and your local fire marshall.
  - **o** Materials to control a hazardous waste spill (such as spill absorbents, overpack drums, and extra 55-gallon drums); and
  - **o** Decontamination supplies (such as neutralizing agents like lime).
- ✓ Maintain a list of emergency phone numbers at each telephone.
- ✓ Maintain a central list of the locations of all fire extinguishers, along with fire extinguisher location wall diagram.
- ✓ Maintain spill control materials.
- ✓ Maintain any installed fire alarm systems.

✯ See Appendix 7 for a sample Emergency List you can use in your shop.✯

- ✓ Keep enough aisle space in all work areas to allow people to get out in case of an emergency.
- ✓ Do not block emergency or safety equipment.
- ✓ Develop a written emergency preparedness and emergency response plan.

  ✯ *See Appendices 8 and 9 for Sample Emergency Preparedness Tools and an Emergency Response Plan* ✯
- ✓ Inform your local fire marshal about the types of hazardous waste you handle at your shop. This way, if an emergency occurs, they will be prepared to respond.

  ✯ *See Appendix 6 for a Sample Letter to Local Authorities* ✯
- ✓ Teach your employees about the emergency plan during their hazardous waste training.

3.2.6 Training your employees

Training your employees on the proper handling of hazardous waste will help avoid spills, fire, and explosions. **This section will help you think about training for your employees that handle hazardous waste.**

Training for employees who handle hazardous waste is not required for CESQGs. However, using the following Best Management Practices (BMPs) to design hazardous waste training for your employees can help prevent release of hazardous wastes.

Please consider implementing the following good ideas for training your employees that handle hazardous waste. Especially important points listed on the certification checklist are in **bold**.

GOOD IDEAS

Do:

- ✓ Train your shop's staff to identify hazardous waste.
- ✓ Train your shop's staff to inspect and handle hazardous wastes.
- ✓ Train your shop's staff to follow Emergency Response Procedures.
- ✓ Consider using the training requirements found in Section 3.3.6.
- ✓ Include training on pollution prevention. After being trained, your employees should know how to reduce the amount of hazardous waste.
- ✓ Provide training to all new employees within six months of hiring them. You should also provide refresher training every year.
- ✓ Keep a record of your hazardous waste training for 3 years. You should record:
  - **o** The dates and times of the training;
  - **o** What topics the training covered;
  - **o** Who attended the training; and,
  - **o** Who provided the training.

3.3 SQGs: How to manage your hazardous waste

Review this section of the workbook if you generate hazardous waste and are a Small Quantity Generator (SQG).

- ✓ If you do not generate hazardous waste, skip to Section 3.4.
- ✓ If you do generate hazardous waste and are a CESQG, you should skip this section. Make sure you have read section 3.2 instead.
- ✓ If you are not sure if your shop is an SQG, review and complete Section 3.1.

This section contains information on the requirements and best practices for managing hazardous waste at an SQG shop.

When you are finished reading this section, you should be able to answer the following questions on the Auto Body Self-Certification Checklist:

- Are all hazardous waste containers properly labeled?
- Are all containers holding hazardous waste managed to prevent or to minimize accidental releases?
- Is the accumulation area inspected weekly for signs of spills or container deterioration?
- Does your shop send all hazardous wastes to a permitted hazardous waste treatment, storage, or disposal facility or a state authorized facility?
- Does your shop have a program that trains employees who handle hazardous waste in proper waste management procedures?
- Does your shop have all required records?

3.3.1 Labeling containers

Containers holding hazardous waste must be appropriately labeled.

This section will help you comply with hazardous waste container labeling requirements.

REQUIREMENTS FOR LABELING CONTAINERS

You must make sure all your hazardous waste containers are properly labeled.

This means you:

Do:

- ✓ Always label all containers and tanks holding hazardous waste with the words "HAZARDOUS WASTE." Hazardous waste containers in satellite accumulation areas should also be labeled either with the words "HAZARDOUS WASTE" or with other words that say what is in the container. A satellite accumulation area simply means a place where you store waste as you work, before you move the waste to a central location in your shop.
- ✓ List on the label exactly what is stored in the container.
- ✓ Date each container label.
  - o If the storage container is in your central hazardous waste storage area, record the date that you started storing hazardous waste in the container.
  - o If the container(s) is in the satellite accumulation area, you can accumulate up to 55 gallons of any one waste. When you have filled a container, record the date and move it to central storage area.

3.3.2 Managing containers

Hazardous wastes must be stored in appropriate containers and handled carefully.

This section will help you manage and handle your hazardous waste containers to prevent leaks, spills, and explosions.

REQUIREMENTS FOR MANAGING CONTAINERS TO PREVENT RELEASES

You must manage hazardous waste containers to prevent wastes from leaking, spilling, or exploding. This means you:

Do:

- ✓ Always keep container lids and bung holes closed, except when you are filling or emptying the container. If you have hazardous waste tanks, always keep their lids closed as well.
- ✓ Keep your storage containers in good shape, with no leaks, corrosion, bulges, etc. If a container is not in good condition or is leaking, transfer the hazardous waste into a container that is in good condition.

- ✓ Open, handle and store hazardous waste containers carefully to prevent the waste from leaking or spilling. Protect them from moving vehicles.
- ✓ Store wastes in containers that are compatible with the waste or use containers with compatible liners, so the wastes will not dissolve, corrode, or react with the container. Steel drums approved by the US Department of Transportation (USDOT) should be used for all paints, thinners, gun cleaners, and paint strippers. Acid wastes should be stored in USDOT approved plastic containers, not metal drums.
- ✓ Store all containers far enough apart so you have room to inspect thoroughly.
- ✓ Separate containers by distance or a physical barrier (like a dike, berm, or wall).
- ✓ Separate containers holding wastes that could react with each other.
- ✓ Store rags and any other materials that may have touched solvents or paint strippers in closed, airtight containers. Leaving dirty, solvent-soaked rags lying around can cause a fire or explosion if fumes from the rags come in contact with a spark.

In addition to the requirements above, the following Best Management Practices (BMPs) are good ideas to help prevent hazardous wastes from leaking, spilling, or exploding.

GOOD IDEAS

Do:

- ✓ Store only one type of hazardous waste in one container. Mixing wastes can cause dangerous reactions. Mixed wastes can be more expensive and difficult to dispose of.
- ✓ Store containers on a surface that will prevent and contain spills and leaks, such as a small concrete pad with a berm, or a commercially available containment pallet or tray.
- ✓ Store containers inside, protected from the weather.
- ✓ Keep containers with ignitable or flammable hazardous waste at least 50 feet inside your property line. Post large “No Smoking” signs near these containers
- ✓ Properly dispose of hazardous waste containers.
- ✓ Use a ground strap on metal drums to avoid sparks from static electricity.

Don’t:

- ✖ Let your containers leak, rust, or get damaged.
- ✖ Let rainwater accumulate on the top of drums.
- ✖ Allow smoking near hazardous wastes.

3.3.3 Accumulating and storing hazardous waste

You may only store a limited amount of hazardous waste at your shop, for a limited amount of time. **This section will help you understand requirements for hazardous waste accumulation and storage.**

If you generate small amounts of hazardous waste throughout your shop, you may store these wastes close to where you generated the waste, in what are called "satellite accumulation areas." A satellite accumulation area simply means a place where you store waste as you work, before you move the waste to a central location in your shop.

REQUIREMENTS FOR ACCUMULATING AND STORING HAZARDOUS WASTE

You must inspect hazardous waste storage areas regularly, store hazardous wastes carefully, and keep within the limits for the amount of waste you can legally store.

This means you:

Do:

- ✓ Inspect the accumulation area weekly for signs of spills, container deterioration or improperly sealed containers.

  ✯ *See Appendix 4 for a sample Inspection Checklist you can use at your shop.*✯
  (Suggestion - post an inspection checklist in the accumulation area where it is visible.)
- ✓ Keep written records of the hazardous waste accumulation area inspections for 3 years.
- ✓ If the storage area contains ignitable or reactive wastes, protect them from materials or conditions such as sparks or heat that could cause them to catch fire or explode.
- ✓ Submit information on the shop and its waste accumulation areas to local police, fire departments, and hospitals.

  ✯ *See Appendix 6 for a sample Letter to Local Authorities.*✯
- ✓ If your shop has a satellite accumulation area:
  - **o** Maintain all satellite accumulation containers under control of the operator and at or near the point of generation;
  - **o** Keep the satellite accumulation container(s) closed;
  - **o** Keep the satellite accumulation container(s) in good condition.

Don't:

- ✖ Accumulate more than 1,595 gallons (about 29 drums) or 13,000 pounds of hazardous waste at your shop at one time.
- ✖ Store hazardous waste at your shop for more than 180 days. If you must ship waste more than 200 miles away for disposal, do not store the waste at your site for more than 270 days.
- ✖ Accumulate more than 55 gallons of hazardous waste at each satellite accumulation area.

In addition to the above requirements, **the following Best Management Practices (BMPs) are good ideas for storing hazardous waste to help prevent leaks, spills, or explosions.**

GOOD IDEAS

Do:

- ✓ Use secondary containment at the hazardous waste storage area. Secondary containment means tools such as dikes, berms, retaining walls, curbing, or other systems that will hold hazardous wastes in case your primary hazardous waste containers leak.

3.3.4 Shipping your waste

All of your hazardous waste must be transported by a permitted hazardous waste hauler to a permitted hazardous waste recycling, treatment, storage or disposal facility. You must keep required records. **This section will help you comply with regulations for shipment of your hazardous waste.**

REQUIREMENTS FOR SHIPPING YOUR WASTE

You must send all hazardous wastes to a permitted hazardous waste treatment, storage, or disposal facility, and keep all required records.

This means you:

Do:

- ✓ Ship your hazardous waste to a permitted hazardous waste recycling, treatment, storage or disposal facility.
- ✓ Only use a hauler with a Virginia Hazardous Waste Transporter Permit to transport your hazardous waste.
- ✓ Prepare a hazardous waste manifest for all hazardous waste that is shipped off-site by a permitted hazardous waste transporter. Fill in all parts of the manifest. Keep returned copies of hazardous waste manifests with the signature of the person who accepted the waste at the recycling, treatment or disposal facility. This returned copy of the manifest shows that your hazardous waste was properly delivered.
  (Suggestion- attach a copy of the original manifest to the returned signed copy together with the Land Disposal Restriction Form See Appendix 10)
- ✓ Keep the hazardous waste manifest for at least 3 years.
  ✯ *See Appendix 5 for a sample Hazardous Waste Manifest.* ✯

Don't:

- ✖ Dispose of your hazardous waste in a solid waste landfill, municipal waste incinerator, or in a dumpster.
- ✖ Dispose of your hazardous waste at your shop, for example, by flushing it down the drain, pouring into a storm drain, stream, or on the ground.
- ✖ Dispose of your hazardous waste at your shop, for example, by burning it or allowing it to evaporate into the air.
- ✖ Transport your own hazardous waste to another location.

In addition to the requirements above, **the following Best Management Practices (BMPs) are good ideas for shipping hazardous wastes.**

GOOD IDEAS

Do:

- ✓ If your hazardous waste is recycled, and if you and your licensed hazardous waste recycler have a reclamation agreement, keep a copy of the agreement in your records.
- ✓ Check with business colleagues or industry trade associations to help you choose an appropriate hauler or recycling, treatment, or disposal facility to handle your waste. You can also contact the **DEQ's Bob Wickline** for suggestions, at **(804) 698-4213**.

3.3.5 Planning for emergencies

Maintaining safety and emergency equipment and plans at your shop can greatly reduce the impact if a spill or explosion does happen at your shop. **This section will help you prepare for emergencies that could occur in your shop.**

REQUIREMENTS FOR PLANNING FOR EMERGENCIES

You must plan and prepare for hazardous waste emergencies. This means you:

Do:

- ✓ Have a telephone to call for help.
- ✓ Have fire-extinguishing equipment, identify the locations and have inspected annually.
- ✓ Test fire-extinguishing equipment.
- ✓ Maintain an internal communication system (such as an alarm system or intercom) if your accumulation area is remote.
- ✓ Make sure that aisle space allows unobstructed movement of personnel and emergency equipment.
- ✓ Post a list next to the main telephone or radio with the phone number for the fire department, location of your emergency equipment, and the phone number of at least one person who is on standby and will coordinate emergency response.
  ✯ *See Appendix 7 for a sample Emergency List you can use in your shop.* ✯

In addition to the above requirements, **the following Best Management Practices (BMPs) are good ideas to help you plan and prepare for any emergencies at your shop.**

GOOD IDEAS

Do:

- ✓ Keep the following equipment to help your shop be prepared for an emergency:
  - **o** An internal communication or alarm system to immediately alert all employees if an emergency occurs (for example, a fire alarm or an intercom system);
  - **o** Materials to control a hazardous waste spill (such as spill absorbents, overpack drums, and extra 55-gallon drums); and
  - **o** Decontamination supplies (such as neutralizing agents like lime).
- ✓ Develop a written plan for how to prevent and respond to emergencies that includes:
  - **o** How you will maintain and operate your shop to minimize the possibility of fire, explosion or any other unplanned release of hazardous waste;
  - **o** The name and contact information for the emergency coordinator responsible for responding to accidents;
  - **o** Fire, spill, and explosion response procedures;
  - **o** What emergency equipment is in place at your shop; and
  - **o** Evacuation plan, signals and routes.

  ✯ *See Appendices 8 and 9 for a sample Emergency Preparedness Tool and Emergency Plan of the type you should create for your shop.*✯
- ✓ Inform your local fire marshal about the types of hazardous waste you handle at your shop. This way, if an emergency occurs, they will be prepared to respond.

  ✯ *See Appendix 6 for a Sample Letter to Local Authorities* ✯
- ✓ Teach your employees about the emergency plan during their hazardous waste training.

3.3.6 Training your employees

Training your employees on the proper handling of hazardous waste will help avoid spills or explosions. **This section will help you think about training for your employees that handle hazardous waste.**

REQUIREMENTS FOR TRAINING YOUR EMPLOYEES

You must provide training for your employees that handle hazardous waste. This means you:

Do:

- ✓ Train employees who handle hazardous waste in proper waste management procedures. This means that employees should know where the Material Safety Data Sheets (MSDS's) are kept and understand:
  - **o** What a hazardous waste is, and which wastes are hazardous at your shop. Employees should be able to tell when a new product or waste might be hazardous. They should also know how to read and use the MSDS's and understand warning labels on hazardous products. They should know where MSDS's are filed.
  - **o** How to properly store and accumulate wastes to prevent and to minimize accidental releases. After being trained, your employees should be able to:
    - Avoid spills (for example, by using funnels, drip pans, and absorbent materials);
    - Use equipment to protect themselves (such as gloves, eye protection, and respirators)
    - Keep hazardous wastes separate from one another and from other materials;
    - Store materials and wastes correctly; and
    - Avoid improper disposal of waste.
  - **o** How to properly label containers with the words "HAZARDOUS WASTE" and the date when materials were first put in the empty container,
  - **o** How to follow Emergency Response Procedures, including how to:
    - Respond to spills or other accidents;
    - Respond to communications and alarm systems;
    - Contact emergency responders (fire, police, and ambulance);
    - Find emergency equipment;
    - Extinguish a small fire, when to try to do so, and the proper equipment to use for extinguishing each particular type of fire;
    - Contain and clean up a waste spill; and
    - Use evacuation plans and routes.
  - **o** How to maintain required hazardous waste records.
- ✓ Keep records indicating that an employees' training program is occurring.

In addition to the above requirements, **the following Best Management Practices (BMPs) are good ideas for your employee-training program.**

GOOD IDEAS

Do:

- ✓ Include training on pollution prevention. After being trained, your employees should know how to reduce the amount of hazardous waste they generate by carefully managing inventories, substituting less toxic materials where possible, and recovering and recycling waste.
- ✓ Provide training to all new employees within six months of hiring them. You should provide refresher training every year.
- ✓ Keep a record of your hazardous waste training for 3 years. You should record:
    - **o** The dates and times of the training;
    - **o** What topics the training covered;
    - **o** Who attended the training; and,
    - **o** Who provided the training.

3.4 Universal waste (applies to all auto body shops)

Universal waste is a separate classification of waste that includes:

- o **Batteries:** This includes both dry cell batteries, such as AA and D used for electronic devices, and lead-acid batteries, such as car batteries. This category includes common alkaline batteries as well as less common batteries like those made of lithium and nickel metal hydride. Used car batteries don't have to be managed as universal waste if they are sent to a recycler. Lead acid batteries must be reclaimed or recycled within one year.
- o **Mercury thermostats:** These thermostats may be marked as containing mercury. Alternately, you can usually identify a mercury thermostat by opening it up and seeing a glass tube with mercury inside the tube. Do not discard any thermostat unless you are positive it does not contain mercury.
- o **Mercury-containing UV and fluorescent light bulbs:** Mercury-containing fluorescent lights usually have a silver end-cap. If the manufacturer identified your lamps as low-mercury/non-regulated by marking the box or by putting brown or green end-caps on the bulbs, you do not have to manage these bulbs as universal waste. They can be managed as non-hazardous solid waste. (See DEQ's web-site for fluorescent lights: http://www.deq.state.va.us/waste/fllights.html)
- o **Pesticides:** Includes pesticides which are commercially available and those that have been banned, which you may want to dispose of.

Rules for Universal Waste allow a business to handle these types of wastes with less strict guidelines than the hazardous waste regulations. Any shop that uses these items must choose to either manage them as "universal waste" or as hazardous waste when those items reach the end of their usefulness.

This section of the workbook explains what you must do to comply with these regulations if you choose to manage your waste as "universal waste." If you choose to manage your waste as hazardous waste, refer to Sections 3.1 – 3.3 of this workbook.

It is very important to manage universal wastes properly. Universal wastes can contain heavy metals and other hazardous materials that can contaminate the environment and the food chain for decades. Batteries, mercury thermostats, and mercury-containing lamps should ***never*** be sent to solid waste landfills.

This section will help you:

- ✓ Understand how to dispose of universal waste in accordance with regulations;
- ✓ Improve your shop's universal waste handling practices and awareness.

When you are finished reading this section, you should be able to answer the following questions on the Auto Body Self-Certification Checklist:

- ➢ What is your shop's universal waste handler status?
- ➢ Have you made your employees aware that batteries, mercury thermostats, mercury-containing UV and fluorescent lights and other universal wastes must be handled according to requirements for universal waste (or hazardous waste)?
- ➢ Is your shop in compliance with all of the requirements for handling, transporting and disposing of universal wastes?

3.4.1 What is your universal waste handler status?

As with hazardous waste, universal waste requirements are different depending upon the amount of waste that a business handles. However, **universal waste handler categories are NOT the same as hazardous waste generator categories**. There are only two universal waste handler categories: Large Quantity Handler and Small Quantity Handler.

- o **Small Quantity Handlers** accumulate some amount of universal waste, but less than 11,000 pounds per year. If your shop is a small quantity handler, please continue reading to learn more about the universal waste requirements you face.
- o **Large Quantity Handlers** accumulate 11,000 pounds or more of universal waste per year. This workbook does not provide the requirements for Large Quantity Handlers, because the Auto Body Self-Certification Program is targeted at small shops. Please **contact DEQ's Northern Virginia Regional Office** at **(703) 583-3813** if your shop is in this category.

Your shop is not a handler of universal waste if your shop does not accumulate any waste batteries, mercury thermostats, mercury-containing UV and fluorescent lights, or pesticides. If your shop is not a handler of universal waste, please skip to Section 3.5 of the workbook.

3.4.2 How to properly handle universal waste

All small quantity handlers of universal waste must meet all of the following requirements.

REQUIREMENTS FOR SMALL QUANTITY HANDLERS OF UNIVERSAL WASTE

You must ensure that your shop handles universal waste in such a way that it cannot endanger the environment or the health of your employees and the community.

This means you:

Do:

- ✓ Keep universal waste in closed containers that prevent any parts of the waste from being released.
- ✓ Label all universal waste containers with the type of waste that's inside.
- ✓ Keep records of the dates on which universal waste is generated.
- ✓ Inform all employees that handle universal waste about proper handling and emergency procedures. (Several safety/spill procedures are listed under "Good Ideas" in this section.)
- ✓ Send all universal waste ONLY to another universal waste handler, a permitted facility, or a foreign destination within a year from the date generated.
- ✓ Maintain shipping manifests/shipping papers for universal wastes.

Don't:

- ✖ Keep universal waste for more than one year from the time it was generated.
- ✖ Use lamp-crushing devices if you want to manage the lamps as universal waste. If you choose to use a lamp-crushing device, you must have a hazardous waste permit. Contact **DEQ's Northern Virginia Regional Office** at **(703) 583-3813** for further information.

GOOD IDEAS

In addition to the above requirements, the following Best Management Practices (BMPs) are good ideas for properly handling universal waste.

Do:

- ✓ Send light bulbs for recycling, packaged according to your recycler's instructions. Appendix 11 includes a list of fluorescent light recyclers.

- ✓ Safely respond to mercury spills, such as a broken light bulb or thermostat. Consider the entire light bulb as hazardous waste when broken and clean up properly:
    - **o** Buy a mercury spill kit and train your employees how to use it to clean up spills.
    - **o** Immediately after a spill, ventilate the area because mercury can quickly turn into a vapor that can damage the lungs. If a light bulb or mercury thermostat is broken, open the windows and close the doors to other rooms. If there are no windows, leave the door open and prop open all doors in the shop until there is a clear path to the outside.
    - **o** After a spill, if a spill kit is not available, wear a dust mask and plastic gloves and sweep up the glass and powder with a broom. The mercury in UV and fluorescent light bulbs is not in the easily recognized silvery liquid form.
- ✓ Store light bulbs in the containers they were received in, to prevent breakage.
- ✓ Keep universal waste containers where they are not likely to be knocked over or run into.
- ✓ Store batteries inside in a cool location in a vented, nonmetal container. Do not place an airtight lid on the container, because gases that normally vent from batteries may be trapped, creating a potentially dangerous situation.
- ✓ Prevent used batteries from short-circuiting by placing batteries in separate containers or putting tape over the terminals.
- ✓ Inspect battery containers regularly to ensure they are not leaking or broken. Put batteries into new containers if you find that containers are leaking or broken.
- ✓ Carefully handle batteries that are dirty or have a white, film-like substance around the terminals. This may indicate that caustic materials have leaked out of the batteries. Wear eye protection, protective gloves and wash your hands with soap and water after handling the batteries.
- ✓ Keep a spill kit and personal protection equipment next to the battery storage area, in case there is a spill. Ensure there is an eye wash station at the battery storage area and mark it. The spill kit should include baking soda or lime to neutralize the acid, as well as clean-up materials such as rags, diapers or kitty litter.
- ✓ React properly and promptly if a lead acid battery spills or leaks:
    - **o** Stop the source of the leak or spill.
    - **o** Place the broken, cracked or leaking battery in a closed, watertight, acid-resistant storage container. NEVER assume a broken battery is completely dry, even if you think there is no more acid inside.
    - **o** Prevent spilled material from spreading.
    - **o** Neutralize the acid with baking soda or lime.
    - **o** Soak-up neutralized acid with a clean dry rag, diaper, or kitty litter.
    - **o** Dispose of clean-up material in a labeled, acid-resistant, covered storage container.
    - **o** Have used clean-up material collected by an authorized hazardous waste hauler.

Don't:

- ✖ Ever use a shop vacuum to clean up mercury or broken UV and fluorescent light bulbs.
- ✖ Tape light bulbs together for shipping.
- ✖ Overstuff or under fill light bulb shipping boxes.

3.5 Fuel and used oil

Shops that handle fuel and oil must carefully follow requirements to ensure that these materials do not contaminate the water and the air. For instance, liquid fuel can escape storage tanks through cracks, and contaminate groundwater supplies for miles around. Fuel vapors can escape tanks at filling points or at pumps, and pollute the air. For a mobile fuel transfer station use one that is OSHA approved (i.e. "Gas Buggy"). Used oil becomes contaminated with toxic chemicals during normal usage. If it is released into the water or burned, toxic contaminants can endanger the health of workers, the community and the environment. A single quart of motor oil can pollute 250,000 gallons of drinking water.

This section will help you:

- ✓ Understand that storage tanks for fuel and oil must meet special DEQ requirements;
- ✓ Understand the requirements for properly handling used oil and used oil filters; and
- ✓ Learn voluntary practices to manage your used oil even better.

When you are finished reading this section, you should be able to answer the following questions on the Auto Body Self-Certification Checklist:

- ➢ Does your shop have one or more storage tanks for fuel or oil, either above ground or underground?
- ➢ Does your shop generate any used oil?
- ➢ Is your shop in compliance with all of the requirements for handling used oil?
- ➢ Does your shop send its used oil for recycling?

3.5.1 Fuel/oil storage tanks

You need to read this section if your shop stores new or used fuel and/or new or used oil in any kind of tank -- whether that tank is above ground or underground. You are responsible for meeting tank requirements and ensuring that fuel/oil does not escape these tanks, and contaminate the environment.

If your shop does not have storage tanks for fuel or oil, continue on to Section 3.5.2.

REQUIREMENTS FOR FUEL/OIL STORAGE TANKS

You must ensure that all oil/fuel storage tanks meet requirements that protect the air and water. These requirements apply to above ground and underground tanks.

This means you:

Do:

- ✓ Contact the **DEQ Petroleum Program** at **(703) 583-3809** to find out and comply with storage tank requirements.
- ✓ Notify the **DEQ Northern Virginia Regional Office's Pollution Response Program** at **(703)583-3864** at any time if your shop has a release of fuel or oil to the environment. This includes any releases to asphalt or concrete surfaces that drain to storm sewers or surrounding soil.

3.5.2 What is used oil?

Used brake fluid, compressor oils, coolants, electrical insulating oil, engine oil, heating media, hydraulic oil, lubricants, cutting oil, refrigeration oil, power steering fluid and transmission fluid are used oils. Used oil is considered contaminated.

If your shop generates any quantity of used oil and used oil filters, you are responsible for properly handling, recycling, and disposal. Keep reading to understand your requirements and recommended best practices. If your shop does not generate any used oil, you can skip to Section 3.6.

3.5.3 How to handle used oil and used oil filters properly

There are regulations to follow if your shop generates used oil. These regulations help protect the environment and the safety of you and your employees.
Information may be found at http://www.deq.virginia.gov/waste/hazardous5.html.

REQUIREMENTS FOR HANDLING USED OIL AND USED OIL FILTERS

You must ensure that your shop meets all requirements for generators of used oil.

This means you:

Do:

- ✓ IMMEDIATELY respond to any releases or spills of used oil:
  - **o** Stop, contain, and clean up the release.
  - **o** Properly manage any materials (such as soil or kitty litter) contaminated with used oil. You can send these to shops that accept petroleum-contaminated materials.

- **o** Call the DEQ Northern Virginia Regional Office (NVRO) Pollution Response Program (PREP) at (703) 583-3864 to report the substance and approximate quantity spilled. This includes petroleum products, paints and paint thinners.

- ✓ Label all used-oil containers and tanks with the words "Used Oil."
- ✓ Fully drain all used oil filters before storing and disposing/recycling. It usually takes 24 hours to fully drain a filter. Store the drained oil in the used-oil container.
- ✓ Keep all used oil filters (including transmission fluid filters) in a container with a closed lid.
- ✓ Label all used oil filter container with the words "Used Oil Filters Only."

Don't:

- ✖ Mix used oil with hazardous waste.
- ✖ Burn used oil in a used oil fire space heater unless it meets the specifications established under 40 CFR Part 279.

GOOD IDEAS

In addition to the above requirements, the following Best Management Practices (BMPs) are good ideas for properly handling used oil. Especially important points listed on the certification checklist are in **bold**.

Do:

- ✓ **Send your used oil to a used oil recycler.** This conserves resources and keeps oil from contaminating the environment. You may be able to obtain information about oil recycling from the National Oil Recyclers Association (NORA) at (703) 753-4277, www.noranews.org. For information and a list of collection facilities, contact **DEQ's Steve Coe** at (**804) 698-4029**, http://www.deq.virginia.gov/recycle/usedoil.html.
- ✓ Keep your used oil container protected from the weather and tightly covered. This is a VERY important practice.
- ✓ Install secondary containment around storage areas. Secondary containment includes a small impermeable concrete pad and berm or a commercially available containment pallet or tray.
- ✓ Maintain spill-control material and equipment near stored fluids.
- ✓ Check all fluid storage containers for leaks and spills on at least a weekly basis. Keep the inspection records for 3 years.
- ✓ Send your used oil filters to a used oil filter recycler. For information and a list of collection facilities, contact **DEQ's Steve Coe** at **(804) 698-4029**, http://www.deq.virginia.gov/recycle/usedoil.html.
- ✓ Keep manifests or bills of lading for all of your used oil shipments for 3 years.
- ✓ Train employees how to properly manage used oils.

- ✓ Use tight-fitting lids and leak-proof spigots, funnels or pumps to transfer fluids.
- ✓ Equipment (such as drain pans or funnels) utilized to handle used oil should not be used for other liquid wastes. This helps avoid contamination.

3.6 Preventing pollution from hazardous waste, universal waste, and used oil

As discussed in Section 1 Best Practices for Auto Body Shops, pollution prevention means reducing waste through efficient use of energy, raw materials, and water. Auto body shops that prevent pollution help the environment and can often cut costs and increase profits. Reducing waste can also help reduce regulatory requirements. For example, if you are a Small Quantity Generator of hazardous waste, reducing your waste could help you become a Conditionally Exempt Small Quantity Generator with fewer requirements for hazardous waste.

This Section will help you identify ways to use your shop's resources more efficiently while preventing pollution from hazardous and universal waste and used oil. You can also contact **DEQ's Office of Pollution Prevention** to get free non-regulatory assistance in pollution prevention. Just call **Sharon Baxter** at **(804) 698-4344**.

When you are finished reading this section, you should be able to answer the following question on the Auto Body Self-Certification Checklist:

- ➢ Has your shop implemented pollution activities for hazardous waste, universal waste or used oil?

Please consider implementing the following good ideas to prevent pollution from your auto body shop. Points listed in **bold** below are in the certification checklist.

GOOD IDEAS

Do:

- ✓ **Pre-clean parts with mechanical techniques (like a squeegee, a rag or a wire brush)** to reduce the use of solvents.
- ✓ **Use a solvent recycler to recycle thinners, gun cleaners, or other solvents.**
- ✓ **Keep spill-absorbent material available for cleaning spills.**
- ✓ **Store partially used absorbents in closed, labeled containers, right next to the containers for new absorbents.** Reuse partially used absorbents instead of throwing them away.
- ✓ **Keep liquids covered (required) and in cool places to reduce evaporation.** For example, covering a parts washer can reduce evaporation and make your solvent last longer.

- ✓ **Buy low-mercury fluorescent lights.** Look for lights with a brown or green end cap, which are usually low mercury.
- ✓ **Reuse or recycle all used electronics.** Contact the **DEQ's Steve Coe** at **(804) 698-4029** to find out about organizations/companies that may accept your used (but functioning) electronics for reuse (and potential tax deduction for your business).
- ✓ **Take steps to avoid drips and spills of used oil.** Always use drain pans and take other steps identified in the "Good Ideas" Section of Section 3.5.3.
- ✓ Keep a well-organized shop to avoid accidents and spills.
- ✓ Send your used fluorescent bulbs to a recycler.
- ✓ Replace and recycle automotive switches that contain mercury -- for example, switches used in trunk and hood lighting, and in anti-lock braking systems. Ball bearing switches may be an alternative.
- ✓ Recycle mercury thermostats and replace with non-mercury thermostats.
- ✓ Minimize the use of batteries whenever possible.
- ✓ Have the spray booth ventilation stacks inspected annually.

Don't:

- ✘ **Buy high-mercury UV and fluorescent lights.**

Section 4:

Solid Waste

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4.1 Introduction to solid waste

For the most part, "solid waste" is what most people think of as trash, rubbish or garbage -- as long as it is not otherwise regulated by DEQ. Auto body shops generate many types of solid waste, such as used shop towels, empty containers and drums, sand blast grit, sanding dust, and even leftover lunches. Despite its name, even some of the liquids and gases can be considered solid waste.

Solid waste matters because even though it is not considered "hazardous" in regulatory terminology, it can damage the environment if not properly disposed of. Also, poorly managed solid waste can make a business and a community look and smell bad. This Section of the workbook explains what you must do to comply with regulations. This Section also gives tips for reducing, reusing and recycling solid waste, which can save you money.

This Section will help you:

- ✓ Understand how to dispose of solid waste in accordance with regulations; and
- ✓ Improve your shop's practices to reduce solid waste and prevent pollution.

When you are finished reading this section, you should be able to answer the following questions on the Auto Body Self-Certification Form:

- ➢ Does your shop dispose of solid waste separately from hazardous waste?
- ➢ Does your shop have a "first-in, first-out" policy to prevent materials from becoming outdated?

4.2 How to properly dispose of solid waste

DEQ has created the following requirements to ensure that solid waste is properly disposed of so it does not contaminate the environment or create a nuisance in the surrounding community.

REQUIREMENTS FOR DISPOSING OF SOLID WASTE

You must ensure that your shop disposes of solid waste properly. This means you:

Do:

- ✓ Dispose of hazardous waste separately from solid waste.
- ✓ Use municipally provided solid waste pickup/disposal services, if available.
- ✓ Hire a licensed/permitted contractor to pick up and dispose of solid waste, if municipally provided solid waste pickup/disposal is not available.
- ✓ Contact the **DEQ's Alan Lassiter** at **(804) 698-4215**, if you store 100 or more used tires at any one time. If you store that many tires, you are subject to tire handling and storage regulations and need a permit.

Don't:

- ✖ Mix solid waste with hazardous waste.
- ✖ Burn your solid waste. Contact **DEQ** if you have questions **(703) 583-3831**.
- ✖ Dispose of your solid waste on your property.
- ✖ Dispose of liquid waste on the ground or in lakes or streams, or your sewer system..
- ✖ Mix solid waste with used oil.
- ✖ Store solid waste near wetlands and drinking wells.
- ✖ Throw away mercury-containing fluorescent lights, mercury thermostats, and dry cell or lead-acid batteries. These must be managed as universal waste or as hazardous waste.
- ✖ Throw away electronics such as computer systems and monitors. Many electronics contain components that must be managed as hazardous waste.

GOOD IDEAS

In addition to the above requirements, the following Best Management Practices (BMPs) are good ideas for properly managing solid waste.

Do:

- ✓ Label ALL waste containers to prevent mixing of non-hazardous solid waste with other kinds of waste. If your shop mixes waste streams, you must manage all the waste under the most stringent requirements. For example, if solid waste mixes with hazardous waste, all of the waste must be treated as hazardous waste.
- ✓ Keep waste streams separated to increase their potential for reuse, recycling or treatment. For example, having a separate canister for waste paper can enable the recycling of waste paper.
- ✓ Completely use up the contents of aerosol spray cans before opening new cans.
- ✓ Make sure that liquid petroleum wastes are not dripping from towels placed into the trash.
- ✓ Keep waste shop towels in a closed, fireproof container labeled "Used Shop Towels."
- ✓ Store scrap metal for recycling (but don't store for longer than one year!)
- ✓ Store scrap plastics for recycling (bumpers, grills, etc, note one year storage limit)

- ✓ Store used 55 gallon drums and other containers properly.
- ✓ Store your used tires properly and no more than 99 without a permit.
  - **o** Keep them in one location, not scattered.
  - **o** Maintain a fire lane around the pile of tires.
  - **o** Keep them off of grassy areas.
  - **o** Keep them covered so they do not collect water and breed mosquitoes.
  - **o** Keep the tires on rims, if possible, to reduce water collection.
  - **o** Use citrus oil or baking soda to kill mosquito larvae in water, if water does collect in some tires.
- ✓ Send your tires for recycling/retreading.

Don't:

- ✖ Store parts or scrap material for longer than one year. Send as much scrap as possible to recyclers.
- ✖ Throw dirty wipes, paper towels or rags into the dumpster if they have come into contact with solvents, cleaners, and paints.
- ✖ Spray aerosol products into the air to empty spray cans.

4.3 Reducing waste and preventing pollution

Auto body shops can follow a number of good ideas to go beyond compliance in managing solid waste and preventing pollution.

GOOD IDEAS

The following Best Management Practices (BMPs) are good ideas for reducing waste and preventing pollution. Many of these tips may also save you money, and improve your shop's efficiency and effectiveness. Points listed below in **bold** are on the self-certification form.

Do:

- ✓ **Create a "first-in, first-out" policy for product storage areas**, to prevent materials from becoming unnecessarily outdated. To do this, date all materials when they are received and when they are opened, and don't open or use a newer product before finishing an older product.
- ✓ Inspect materials upon delivery and IMMEDIATELY return unacceptable materials to the supplier. This can help avoid unnecessary cost and waste.
- ✓ Put someone in charge of distributing and tracking all supplies and raw materials.
- ✓ Reduce solid waste by laundering shop towels through an industrial laundry service that discharges its wastewater into a public sewer system.
- ✓ Keep accurate records of your material usage to understand your consumption, your progress in reducing usage, and consequently money saved.
- ✓ Keep your storage and work areas clean and well organized.
- ✓ Manage, maintain and monitor your shop for top efficiency:

- **o** Locate and repair all leaks to prevent losses.
- **o** Practice preventive maintenance to avoid losses from leaks.
- **o** Keep all containers covered to prevent evaporation and spills.
- **o** Install flow meters, flow control devices, and/or shutoff nozzles to cut down on water usage.

✓ Recycle cardboard, paper, glass, plastic and metal.

Don't:

✖ Purchase more of a product than you think you will need.

✖ Use chlorinated solvents, because then your rags must be managed as hazardous waste. Use cleaning compounds that are not chlorinated and have low volatile organic compound (VOC) emissions.

Section 5:

Water Pollution

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5.1 Introduction to wastewater issues

Wastewater is generated any time water gets flushed down a drain, washed into the street or onto the ground, or discharged into a septic system. There are three kinds of wastewater to know about:

- **Industrial wastewater** means all wastewater contaminated with materials from auto body shop operations. Such materials include paint and other coatings, solvents, sanding dust, antifreeze, oil, and other automotive fluids. Industrial wastewater includes but is not limited to water from waterfall spray booths, waterborne coatings wastes, wet sanding, tools and equipment washing, work area washing, and car washing.
- **Domestic (or sanitary) wastewater** is generated from using bathrooms, washing hands, showering, and preparing food. Domestic wastewater is not the focus of this workbook. Do not flush any industrial wastewater down bathroom or kitchen sinks, toilets, showers, or other places designed for domestic wastewater.
- **Stormwater** is runoff of rain and melting snow from pavement, roofs, and other surfaces. The runoff can pick up oil, fuel, heavy metals, coating materials, solvents and other materials from pavement and roofs depositing them directly into storm drains and streams, rivers, lakes, and groundwater. It is important to prevent and clean up spills, to not dump waste water and materials into storm drains or on the ground. Store chemicals, materials, and wastes so rain and snow melt do not wash away contaminants

Industrial wastewater can pollute both surface water (like lakes and streams) and groundwater. Public drinking water supplies come from either surface water or groundwater. If your shop does not follow requirements for wastewater, there is a good chance you could contaminate your local drinking water. Even wastewater that is sent to a septic system or down the sewer to a municipal or county treatment plant can cause problems if it contains certain materials that upset the treatment processes. Understanding wastewater issues will help you keep your shop from damaging your local water supplies.

This section will help you:

- Understand if you generate industrial wastewater;
- Understand where your wastewater goes;
- Make sure you meet requirements for floor drains;
- Properly dispose of industrial wastewater and meet requirements for discharging to sewers and septic tanks (where allowed); and
- Conserve water and prevent water pollution.

When you are finished reading this section, you should be able to answer the following questions on the Auto Body Self-Certification Form:

- Does your shop generate any industrial wastewater?
- Does your shop discharge any industrial wastewater to dry wells, cesspools, galleys or other surface leaching systems?
- Does your shop have any floor drains?
- Are any floor drains located near vehicles or in areas where automotive fluids are stored or used?
- Are your floor drains either closed or approved for continued use by EPA?
- Does your shop discharge any industrial wastewater to a public sewer?
- If you discharge to a public sewer are you meeting the requirements of your local sewage authority?
- Does your shop discharge any industrial wastewater to a septic tank?
- Have you called your Health Department or US EPA to make sure that your septic tank is correctly designed and permitted for your wastewater?
- Do you post required signs prohibiting the discharge of industrial chemicals to non-industrial drainage outlets?
- Are concentrated auto body materials ever discharged with your wastewater?
- Do you ever sweep, blow, or wash “sweepings” down drains, sinks, or into water courses?
- Do you follow any priority best management practices to avoid water pollution?
- Have you implemented any water conservation practices?

5.2 What is industrial wastewater?

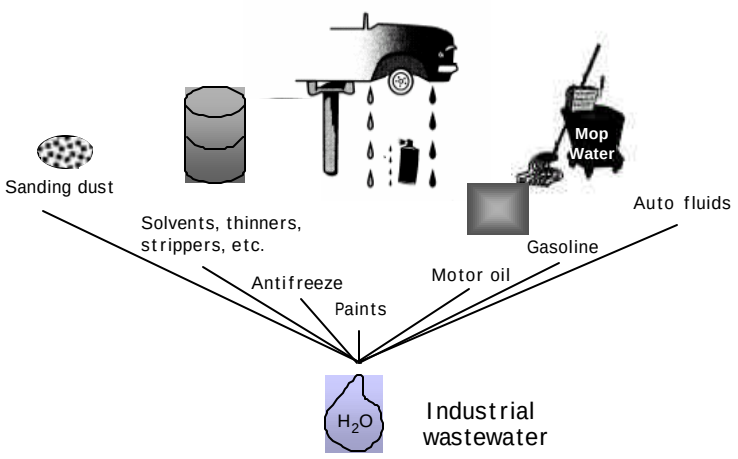
Auto body repair involves the use of many materials that can pollute water supplies if they are not managed properly. For example, here are some of the materials from auto body shops that can contaminate Virginia's ground water supply if discharged to a conventional septic system:

- Paints and paint residue, solvents, thinners, strippers, degreasers, and parts washers;
- Gasoline, motor oil, and auto fluids (e.g., antifreeze, transmission fluid, power steering fluid, brake fluid, and hydraulic fluid) leaked from cars waiting to be repaired; and
- Sanding dust or residue from wet sanding.

The picture on the next page shows some of the different materials that can contaminate your wastewater. If any of these materials gets into your wastewater, then it is industrial wastewater.

If you generate industrial wastewater, you have to meet special requirements that go beyond the requirements for sanitary wastewater (i.e., bathroom or kitchen wastewater). You need to understand what goes into your wastewater and where it goes in order to know if you are following the law.

If any of these materials get into your wastewater, it is **industrial wastewater**.



5.3 Where does your wastewater go?

Once your industrial wastewater goes down the drain, where does it end up? It might drain to a public sewer, septic system, dry well, cesspool, or surface leaching system. To find out, you can check your building's records, ask a plumber, or check with an environmental consultant. If your business is located in a rural area without central sewer, you may also contact EPA and/or the local Department of Health to see if those records are on file. In almost all cases, you can only legally discharge your industrial wastewater to one of two places:

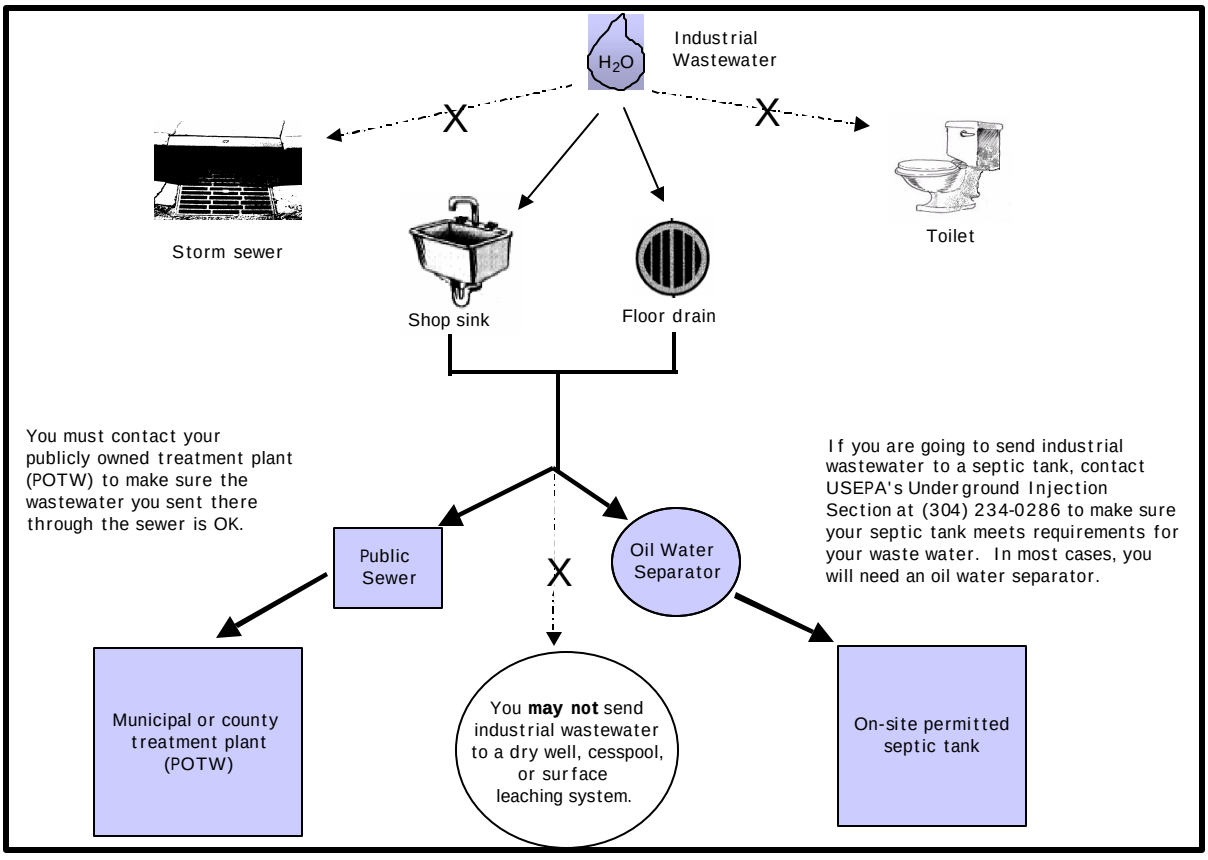
1. The public sewer system (but only if you meet the requirements of the wastewater treatment plant); or

2. A septic tank with an oil/water separator (but only if you have contacted your local Department of Health and the **US EPA Underground Injection Control Program [UIC]** at **(304) 234-0286** to make sure your septic system is designed to handle the wastewater you put into it, and to make sure you have the needed permits).

Discharge of industrial wastewater to dry wells, cesspools, galleys or other surface leaching systems is **not allowed**. You should also be aware that you **must not** construct new septic systems, cesspools, dry wells, or other motor vehicle waste disposal wells that receive industrial wastewater from auto body repair work.

The sections that follow will help you comply with regulations for managing your industrial wastewater.

- **If you have any floor drains**, whether or not they have been sealed, read **Section 5.3.1** below to find out what you must do to comply with current laws.
- **If your wastewater is discharged to a public sewer system**, read **Section 5.3.2** to find out what you must do to legally connect to a sewer system.
- **If your wastewater is discharged to a septic tank**, read **Section 5.3.3** to find out what you must do to legally install, operate and maintain your septic system.



5.3.1 Floor drains

If your shop has a floor drain, they were legally required to have been closed by April 5, 2005 **unless** they met one of three conditions:

1. Floor drains are connected to a **public sewer**, and your shop meets the requirements of the local sewage authority (See **Section 5.3.2** for more information.)
2. Floor drains are connected to a **permitted septic system with an approved, permitted oil/water separator**. (See **Section 5.3.3** for more information on requirements for septic tanks.)
3. Floor drains **ONLY drain clean water** and do not have the *potential* to drain water contaminated with oil, fuel, or any other materials from auto body shop operations. For example, if you have a floor drain that could **only** receive condensation from an ice machine, that is OK.

If you do not meet the conditions above, you must close up your floor drains. Questions - call the **US EPA Underground Injection Control Program [UIC]** at **(304) 234-0286.**

REQUIREMENTS FOR CLOSING A FLOOR DRAIN

Do:

- ✓ Close your floor drain(s), either by hiring a licensed contractor or by doing the work yourself. If you do it yourself, pour cement or bentonite into the drain, filling it to floor level.
- ✓ Contact the US EPA Underground Injection Control Program [UIC] at 304-234-0286 to schedule an inspection to make sure your floor drain is properly closed.

REQUIREMENTS FOR USING EXISTING FLOOR DRAINS

You must seek approval for continued use of the existing floor drain and install an oil/water separator. This means you:

Do:

- ✓ Seek approval for continued use of open floor drains from the **US EPA Underground Injection Control Program [UIC]** at **(304) 234-0286**.
- ✓ Install an oil/water separator, and get approval to operate it from the US EPA UIC program.
- ✓ Contract with a waste hauling company to regularly come clean out the oil waste from the oil/water separator.
- ✓ Supply a copy of the signed waste hauling contract to the EPA UIC program. A waste hauling contract must be maintained as long as the floor drain is connected to an oil/water separator.

5.3.2 Public sewer system

Sewer systems may receive both sanitary and industrial wastewater from auto body shops. If your shop's drains connect to a public sewer system, you must meet the following requirements:

REQUIREMENTS FOR DISCHARGING WASTEWATER TO A PUBLIC SEWER

You must make sure that the hook-up of your drains to the sewer is legal and that you have a wastewater discharge permit, pretreatment permit, or other proper documentation allowing your shop to discharge to the local sewer. This means you:

Do:

- ✓ Find out if there are any pretreatment requirements that apply to your shop, by contacting the local sewage authority. The local sewage treatment plant that receives your wastewater may have requirements such as: limits on discharges to the sewer, prohibitions on certain discharges (such as solvents, gasoline, antifreeze, or waste oils), or that your shop get a permit to discharge. Check the phone book for the telephone number of your local sewage authority.
- ✓ Comply with all the requirements of the local sewage authority. If necessary, obtain a discharge permit, pre-treatment permit, or any proper documentation allowing discharge to the local sewer.

Don't:

- ✗ Discharge any flammable, hazardous, or explosive materials (e.g., gasoline) into your floor drains. For a specific list of materials you may not discharge to the sewer, contact your local sewage authority.

5.3.3 Septic tank

Septic tanks are primarily designed to handle sanitary wastewater from sinks, showers, and toilets in your shop — **not** materials from your auto body work. If your shop is located outside the public sewer system, you may be prohibited from discharging industrial wastewater to your septic tank.

You may only discharge industrial wastewater to a septic system if your septic system is designed and permitted to handle the type of wastewater. Usually an oil/water separator will be part of the system. In order to make sure your septic system meets these requirements, call the **US EPA Underground Injection Control Program [UIC]** at **(304) 234-0286**.

REQUIREMENTS FOR DISCHARGING INDUSTRIAL WASTEWATER TO A SEPTIC SYSTEM

You must make sure that your septic system is constructed, operated and maintained so that it does not pollute groundwater. This means you:

Do:

- ✓ Obtain a permit from your local Department of Health and the US EPA Underground Injection Control Program [UIC] for installing, operating and maintaining a septic system that is designed to handle the type of wastewater your shop generates.
- ✓ If you discharge wastewater with oil or petroleum products into your septic system you must properly install, operate and maintain an oil/water separator unless otherwise directed by the US EPA Underground Injection Control Program [UIC].
  - **o** Contact the US EPA Underground Injection Control Program [UIC] for scheduling an inspection to verify the installation of an oil/water separator.
  - **o** Clean out the oil/water separator periodically.
  - **o** Determine if the sludge and overflow from the oil/water separator is hazardous, and properly dispose of the sludge and overflow based on the waste determination (see **Section 3** on Hazardous Waste Determination for more information).
- ✓ Hire a licensed wastewater hauler to periodically pump your septic tank in accordance with your local requirements.
- ✓ Contact your local Department of Health and the US EPA Underground Injection Control Program [UIC] when you need to repair your septic system. Only use licensed contractors when doing repair work.

Don't:

- ✖ Pour grease, paints, caustic or oily liquids, fuels, anti-freeze, or motor oils into sinks or toilets, or floor drains that connect to the septic tank. These can kill the bacteria and/or plug your disposal system.
- ✖ Construct any buildings or allow traffic over the drainfield and replacement area. Either action may result in costly damage and a violation of the law.

In addition to the above requirements, the following Best Management Practices (BMPs) are good ideas for managing and operating your septic system.

GOOD IDEAS

Do:

- ✓ Know the location of your septic system for repairs, pumping, and traffic and construction avoidance. Make a map or drawing of the location.
- ✓ Keep the septic system manhole location marked for easy accessibility.
- ✓ Keep your septic system records up to date:
  - **o** Obtain a copy of the permit for your septic tank from the contractor or local Department of Health and the US EPA Underground Injection Control Program [UIC] if required. Keep it on file.
  - **o** File detailed records and receipts of all pumping dates, maintenance performed, inspections, and any problems.
- ✓ Recover and recycle the oil from the oil/water separator with your shop's used oil. Recycling companies might take the oil for free, or might even pay you for the oil.

5.4 Other Wastewater Management Practices

The best way to prevent water pollution is to keep your wastewater clean and free of contaminants from your auto body work. The following is required:

REQUIREMENTS FOR PREVENTING WATER POLLUTION

You must take certain basic steps to prevent water pollution. This means you:

Do:

- ✓ Post signs prohibiting the discharge of industrial chemicals and/or industrial wastewater to bathroom or kitchen sinks, toilets, showers, shop wash basins, emergency showers, eyewash stations, or other non-industrial drainage outlets.

Don't:

- ✖ Discharge concentrated paints, fuels, oils or other fluids, solvents, thinners, strippers, cleaners (including concentrated soaps) or solid materials from sanding or auto body repair to wastewater.
- ✖ Sweep, blow, or wash floor dirt, dust, and/or other debris ("sweepings") down open floor drains, sink drains, or any other access way to water sources.

In addition to the above requirements, the following Best Management Practices (BMPs) are good ideas preventing water pollution.

GOOD IDEAS

Points covered on the self-certification checklist are shown in **bold.**

Do:

- ✓ **Keep foreign materials out of your drains.**
  - o **Use dry cleaning methods, such as sweeping and vacuuming, when cleaning.** Sweep floor with a broom or vacuum every day. Use a slightly damp mop for general cleanups, and after sweeping.
- ✓ **Keep all auto body materials (including waste) protected from rainwater, to prevent polluted runoff.**
- ✓ Train your workers in how to prevent water pollution as part of their job duties.

Don't:

- ✖ Allow wastewater to collect and soak into the ground.

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Appendix 1:

Auto Body Air Registration Form

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Virginia Department of Environmental Quality (DEQ)
2005 Northern Virginia Auto Body Shop
Registration Form

(for Air Quality Regulation 9 VAC 5-120-160)

This Registration Form must be completed by all auto body shops whether participating in the Environmental Results Program or not.

If you were registered with the DEQ as a potential source of emissions to the air prior to receiving this form, please complete it anyway to ensure that all information now required is included in your registration. Make copies of what you are submitting to DEQ for your records. If you need extra copies, or have any questions about how to fill out the forms, contact DEQ's Northern Virginia Regional Office at (703) 583-3831.

Mail the completed form to:

Virginia Department of Environmental Quality
Northern Virginia Regional Office
Attn. John McKie
13901 Crown Court
Woodbridge, VA 22193

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Virginia Department of Environmental Quality (DEQ)
2005 Northern Virginia Auto Body Shop
Registration Form

(for Air Quality Regulation 9 VAC 5-120-160)

Section A: General Facility Information

A. 1 Current Registration Number with DEQ (if all ready registered). _____

A. 2 Business Name:

_____

A. 3 Alternate Business Names (if any) and Explain the Difference (e.g. A is the parent company of B): _____

_____

A. 4 Street Address:

_____

City, Zip:

_____

If the mailing address is different from above, complete A.5 and A.6; if not, skip to A.7

A. 5 Street Address or P.O. Box:

_____

A. 6 City, Zip:

_____

A. 7 Business Phone Number: (_____)_____ -- _____

A. 8 Business Fax Number: (_____)_____ -- _____

A. 9 Business Email (if any):

_____

A. 10 Number of Employees: _____

A. 11 Name of Business Owner (First/Last):

_____/_____

A. 12 Owner's Phone (if different from business phone): (____)_____ -- _____

A. 13 Has this business changed any of the following information in the last year:

Business location	☐ Yes - *Answer A.14 and A.15*	☐ No	*If all are no, Skip to A.18*
Business name	☐ Yes - *Answer A.16*	☐ No	
Business ownership	☐ Yes - *Answer A.17*	☐ No	

A. 14 Previous Street Address:

_____

A. 15 Previous City, State Zip:

_____

A. 16 Previous Business Name:

_____

A. 17 Previous Owner Name
(First/Last):_____/_____

A. 18 SIC Code and/or NAICS Code: _____/_____

Example: SIC 7532/NAICS 81112 –
Provide at least one of the two code numbers. The following websites may be of help:
http://www.sba.gov/regulations/siccodes/siccodes.html
http://www.census.gov/epcd/naics/NAICS81.HTM#N811

Your SIC number can also be found on your Virginia Department of Taxation's "Form R-1 Business Registration Application" question #4. Form R-1 has NAICS code table p. 6-8.

A. 19 Business Type: (*Check only one*):

☐ Franchise/Chain (i.e., facilities under contract to another company that own more than one auto body facility; includes company-owned stores and independent franchise owners)

☐ Independent (i.e., facilities that owe no allegiance to any other company or corporation)

☐ Government (includes federal, state, and local government facilities)

☐ Educational (i.e., technical schools that train students in auto body work)

☐ Other (*Specify*)_____

A. 20 A. 20 Type of Services Provided (*Check all that apply*):

(Note: This form is only for use byshops that do auto body work. If the shop provides auto body as well as other types of services, e.g., mechanical repair, it should be included.

☐ Auto Body Work
☐ Mechanical Repairs
☐ Car Wash
☐ Fleet Maintenance
☐ Other (*Specify*) _____
☐ Gas Station
☐ Car Dealership
☐ Salvage Yard
☐ Towing

A. 21 Average number of auto body jobs processed per week: _____

A. 22 Has your shop been inspected by DEQ within the last year?

☐ Yes ☐ No – *Skip to Section A.25*

A. 23 Which DEQ section conducted the inspection? _____

A. 24 When was the inspection conducted? (mm/yyyy) (____/_____)

A. 25 Has your shop heard about the baseline inspections conducted as part of the self-certification program or the training workshops prior to completing the checklist?

☐ Yes ☐ No

Section B: Specific Facility Equipment Information

B. 1 How many paint booths are at your facility? _____

B. 2 Who is the manufacturer and what is the model of each paint booth? If the paint booth was custom-made, please state so.

Paint Booth Number	Manufacturer	Model Number
1.		
2.		
3.		
4.		

B. 3 Describe air pollution control equipment on paint booths or on any other vented equipment (i.e. sanders, paint mixing cabinets, spray-gun cleaning cabinets, etc).

Type of Control Equipment	Efficiency (% of pollutant removal if known)

Section C. Document Certification

Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering and evaluating the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name of Responsible Official (Print):

_____

Title:

_____

Signature:

_____

Mailing Address:

_____

Phone: (____) _____-_____

Date: _____

Appendix 2:

Estimating Your Shop's Air Emissions and Determining Your Shop's Air Emission Status

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Appendix 2:

ESTIMATING YOUR SHOP'S AIR EMISSIONS AND DETERMINING YOUR SHOP'S AIR EMISSION STATUS

Virginia and federal air pollution regulations regulate VOCs, particulates (including sanding dust and paint dust), and hazardous air pollutants (HAPs) generated from auto body repair activities. The example below shows how a shop determines its air emission status based on its total potential emissions of VOCs and HAPs per year.

Determine your potential to emit VOCs and HAPs by the following steps:

Step 1: Find out what the major source level for VOCs and HAPs is. The major source level is the threshold amount of VOCs and HAPs emissions at which the Virginia government considers a shop to be a "major" emitter of air pollutants. If your shop's emission of VOCs and HAPs is more than the major source level, your shop is subject to more stringent regulations, and is required to obtain a Title V operating permit.

- The major source level of HAPs is:
  - 10 tons/year for any single HAP
  - 25 tons/year for total HAPs
- The major source level of VOCs:
  - 50 tons/year if your shop is in:

Alexandria City	Arlington County
Fairfax City	Fairfax County
Falls Church City	Loudoun County
Manassas City	Prince William County
Manassas Park City	Stafford County

Step 2: Look at the Material Safety Data Sheets (MSDSs) of the materials you use to determine the specific VOC and HAPs content. **Review records of materials you purchased** in the last 12 months to determine your maximum usage.

Table 1 is an example from a hypothetical shop. It includes information on materials used, amounts used, VOC content per gallon, and HAP content gallon that the shop will need to calculate total VOC and HAP emissions.

Table 1. Maximum usage and pollutant content of inputs for ABC Collision Repair

Material	**Usage** (gal/year)	**VOC content** (lbs/gal)	**HAP content** (lbs/gal)
Pretreatment wash primers	450	6.5	1.0 (methylene chloride)
Primer surfacers	450	4.8	1.2 (methylene chloride)
Primer sealers	450	4.6	2.3 (Toluene)
Special coatings	1,000	7.0	1.5 (Toluene)
Cleaning solvents	450	7.0	2 (Toluene)

Step 3: Determine the potential to emit VOC and HAPs from each material used. To do this:

- Multiply a material's usage by its VOC content and HAPs content.
- Add the individual VOC emissions.
- Add the individual HAPs emissions.
- Change from pounds of VOCs and HAPs per year to tons of VOCs and HAPs per year. Do this by dividing the result you have by 2,000 (1 tons = 2,000 pounds).

FOR EXAMPLE, the total VOC emissions from ABC Collision Repair are:

Pretreatment wash primers:
450 gal/year * 6.5 lbs/gal = 2,925 lbs of VOC per year from Pretreatment wash primers
(usage) (VOC content)

Primer surfacers:
450 gal/year * 4.8 lbs/gal = 2,160 lbs of VOC per year from primer surfacers
(usage) (VOC content)

Primer sealers:
450 gal/year * 4.6 lbs/gal = 2,070 lbs of VOC per year from primer sealers
(usage) (VOC content)

Special coatings:
1,000 gal/year* 7.0 lbs/gal = 7,000 lbs of VOC per year from special coatings
(usage) (VOC content)

Cleaning solvents:
450 gal/year * 7.0 lbs/gal = 3,150 lbs of VOC per year from cleaning solvents
(usage) (VOC content)

Total potential to emit VOCs:

2,925 lbs/yr	+	2,160 lbs/yr	+	2,070 lbs/yr	+	7,000 lbs/yr	+	3,150 lbs/yr	=	17,305 lbs
(Pretreatment Wash Primer)		(Primer Surfacer)		(Primer Sealers)		(Special Coatings)		(Cleaning Solvents)		of total VOC per year

Change from lbs of VOCs to tons of VOCs by dividing 17,305 lbs by 2,000 lbs/ton:
17,305 ÷ 2,000 = **8.65 tons per year of total VOCs**

Assuming that ABC Collision Repair is in Northern Virginia the results show that ABC Collision Repair is a minor source of VOC emissions because its maximum VOC emissions are less than the major source level of VOCs for Northern Virginia, which is 50 tons per year.

FOR EXAMPLE The total HAPs emissions of ABC Collision Repair are:

Pretreatment wash primers:
450 gal/year * 1.0 lb/gal = 450 lbs of methylene chloride per year from pretreatment wash primers
(usage) (HAP content)

Primer surfacers:
450 gal/year * 1.2 lbs/gal = 540 lbs of methylene chloride per year from primer surfacers (usage) (HAP content)

Primer sealers:
450 gal/year * 2.3 lbs/gal = 1,035 lbs of Toluene per year from primer sealers (usage) (HAP content)

Special coatings:
1,000 gal/year* 1.5 lbs/gal = 1,500 lbs of Toluene per year from special coatings (usage) (HAP content)

Cleaning solvents:
450 gal/year * 2.0 lb/gal= 900 lbs of Toluene per year from cleaning solvents (usage) (HAP content)

Total potential to emit HAPs:

450 lbs/yr	+	540 lbs/yr	+	1,035 lbs/yr	+	1,500 lbs/yr	+	900 lbs/yr	=	4,425lbs
(Pretreatment Wash Primer)		(Primer Surfacer)		(Primer Sealers)		(Special Coatings)		(Cleaning Solvents)		of total HAPs per year

Change from lb of HAPs to tons of HAPs by dividing 4,425 lbs by 2,000 lbs/ton:
4,425 ÷ 2,000 = **2.21 tons per year of total HAPs**

Total potential to emit Methylene Chloride:

450 lb/yr	+	540 lb/yr	=	990 lb of total HAPs per year
(Pretreatment Wash Primer)		(Primer Surfacer)		

Change from lb of Methylene Chloride to tons of Methylene Chloride by dividing 990 lbs by 2,000 lbs/ton: 990 ÷ 2,000 = **0.50 tons per year of total Methylene Chloride**

Total potential to emit Toluene:

1,035 lb/yr	+	1,500 lb/yr	+ 900 lb/yr =	3,435 lb
(Primer Sealers)		(Special Coatings)	(Cleaning Solvents)	of total Toluene per year

Change from lb of Toluene to tons of Toluene by dividing 3,435 lbs by 2,000 lbs/ ton:
3,435 ÷ 2,000 = **1.72 tons per year of total Toluene**

The results shows that ABC Collision Repair is a minor source of HAPs emissions because its total HAPs emissions is less than 25 tons per year and no individual HAP exceeds 10 tons per year.

Appendix 3:

Hazardous Waste Identification Assistance Table

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Appendix 3:

HAZARDOUS WASTE IDENTIFICATION ASSISTANCE TABLE

The following table is designed to help you identify hazardous wastes. The wastes listed here correspond to the wastes in the Hazardous Waste Identification Worksheet in Section 3. Note that wastes in rows 1 – 17 are ALWAYS hazardous. This table explains why. The wastes in rows 18-30 are POTENTIALLY hazardous. This table will help you determine whether or not these wastes are hazardous in your shop.

	Waste	**Is it Hazardous?**	**Why?**
1	Waste or Expired oil-(solvent-) Based Paint	Yes	Waste paints are ignitable as defined in the Federal Regulations if they have a flash point below 140° F.
2	Sludge or Bottoms from a Solvent Recycler or Still that Recycles Paint Gun Cleaner or Thinner	Yes	Still bottoms from a still where the solvent blend contained, before use, ten percent or more of solvents such as xylene, toluene, and acetone are hazardous waste. The mixture may also have a flash point below 140° F.
3	Sludges or Bottoms from Part Washers/Filters	Yes	They are hazardous wastes because they may contain toxic solvents or metals.
4	Sludges or Bottoms from Coolant or Antifreeze Filters/Stills	Yes	They are hazardous wastes because they may contain toxic solvents or metals.
5	Sludges or Bottoms from Hot Dip Tanks	Yes	They are hazardous wastes because they may contain toxic solvents or metals.
6	Methylene Chloride Paint Sludge Stripped from Vehicles	Yes	This waste is listed if the solvent blend contained, before use, ten percent or more of solvents such as methylene chloride, xylene, toluene, and acetone.
7	Paint Thinner	Yes	This waste is listed and characteristic if the solvent blend contained, before use, ten percent or more of solvents such as xylene, toluene, and acetone. The mixture also has a flash point below 140°F.
8	Paint Gun Cleaning Solvent	Yes	This waste is listed and characteristic if the solvent blend contained, before use, ten percent or more of solvents such as xylene, toluene, and acetone. The mixture also has a flash point below 140°F.

	Waste	Is it Hazardous?	Why?
9	Solvent Degreasers	Yes, even if recycled onsite or at an off-site recycling facility	Many of the products used in repair shops for cleaning and degreasing contain ignitable or toxic solvents.
10	Parts Washing Fluid	Yes, even if recycled onsite or at an off-site recycling facility	Many of the products used in repair shops for cleaning and degreasing contain ignitable or toxic solvents.
11	Immersion Cleaners	Yes, even if recycled onsite or at an off-site recycling facility	Many of the products used in repair shops for cleaning and degreasing contain ignitable or toxic solvents.
12	Mineral Spirits (including petroleum naphtha)	Yes, even if recycled onsite or at an off-site recycling facility	Many of the products used in repair shops for cleaning and degreasing contain ignitable or toxic solvents.
13	Brake Cleaner	Yes, even if recycled onsite or at an off-site recycling facility	Many of the products used in repair shops for cleaning and degreasing contain ignitable or toxic solvents.
14	Carburetor Cleaner	Yes, even if recycled onsite or at an off-site recycling facility	Many of the products used in repair shops for cleaning and degreasing contain ignitable or toxic solvents.
15	Waste Methylene Chloride Paint Stripper (Discarded Product)	Yes	The discarded material is a commercial chemical product listed for toxicity.
16	Mercury Switches (for example, this includes some switches used in trunk lighting and in anti-lock breaking systems)	Yes	Mercury is toxic and therefore mercury switches are hazardous waste.
17	Absorbent Materials, such as Speedi-Dry, Contaminated with Hazardous Waste	Yes	Absorbents soaked with materials that are considered hazardous waste also are hazardous waste.

	Waste	Is it Hazardous?	Why?
18	Waste Aerosol Cans	Yes, but if cans are punctured, drained, and sent for scrap metal recycling they are not considered hazardous. Note that the drained fluids may be considered hazardous.	Aerosols like brake cleaner, carburetor cleaner, other degreasers, and spray paints commonly found at auto repair shops are hazardous for the chlorinated solvents they contain, or for ignitability. When discarded with unused contents, they are hazardous waste.
19	Waste Paint Booth Filters	Maybe	Paint booth filters may be toxic, especially when lead-based paints are used. They should be tested to determine whether they contain trace metals or organics that would cause them to be hazardous waste.
20	Waste Masking Paper or Tape Contaminated with Paint	Maybe	Masking paper or tape may be toxic, especially when lead-based paints are used. They should be tested to determine whether they contain trace metals or organics that would cause them to be hazardous waste.
21	Waste Sanding Dust	Generally not, unless you are sanding older cars	Paint dust from older vehicles may be hazardous waste. You may want to periodically test sanding dust to determine whether it contains toxic metals that would cause it to be hazardous waste.
22	Oil/Water Separator Sludge	Maybe	Wastewater separator sludge is considered hazardous waste if it is contaminated with materials that are considered hazardous waste. You should check what materials go into the wastewater to determine if the wastewater separator sludge is hazardous.
23	Oil/water Separator Overflow	Maybe	Wastewater is considered hazardous waste if it is contaminated with materials that are considered hazardous waste. You should check what materials go into the wastewater to determine if the oil/water separator overflow is hazardous.

	Waste	Is it Hazardous?	Why?
24	Floor wash/rinse waters discharge	Maybe	Floor wash/rinse waters discharge is considered hazardous waste if it is contaminated with materials that are considered hazardous waste. You should check what materials are picked up by floor wash / rinse water to determine if your floor wash / rinse water is hazardous.
25	Wastewater from a Water-based Parts Cleaner	Maybe	Wastewater is considered hazardous waste if it is contaminated with materials that are considered hazardous waste.
26	Electronic/computers	Yes, unless sent for reuse.	Electronic components (like printed circuit boards) and Cathode Ray Tubes of computer monitors are considered a hazardous waste. However, they are not considered hazardous waste if they are reused or recycled. For more information call Steve Coe at 1-800-592-5482 ext. 4029.
27	Shop Towels/Rags Contaminated with Hazardous Waste	Maybe	Absorbents are considered hazardous waste if they are soaked with materials that are considered hazardous waste. But, in the case of rags/towels, if they are not soaked (dripping) and they meet the following conditions, they are not considered hazardous waste: 1.) They must be laundered at an appropriate facility (a commercial laundry that is permitted and sends its wastewater to the local sewage treatment plant, not a septic system or drain field), 2.) They must be stored in containers away from a source of ignition, 3.) No other waste can be mixed with rags.
29	Waste Gasoline	Not hazardous waste if recycled. If it is not recycled, it is hazardous waste.	Gasoline is ignitable and it is also toxic because it contains benzene.
30	Waste Coolant/ Anti-Freeze	Probably not.	Waste coolant/antifreeze may be considered hazardous if it is combined with a listed waste or if it contains a heavy metal (such as lead) which causes it to be classified as hazardous. In most cases, waste coolant/antifreeze from late model cars is non-hazardous. Remember: Even though coolant/antifreeze is not classified as a hazardous waste, it is poisonous. If a child or an animal eats antifreeze, it can become sick or die.

Appendix 4:

Hazardous Waste Accumulation Area Weekly Inspection Checklist

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Appendix 4:

HAZARDOUS WASTE ACCUMULATION AREA
WEEKLY INSPECTION CHECKLIST

Date and Time:		**Inspected by:**	
Total Number of Containers:		**Signature:**	

REQUIREMENTS	Meets Requirements	Changes Needed	Date Corrected
EACH CONTAINERS LABELED "HAZARDOUS WASTE"			
EACH CONTAINER HAS ACCUMULATION START DATE			
CONTAINER LABELS LEGIBLE			
CONTAINERS TIGHTLY CLOSED			
NO EVIDENCE OF RUST, DENTS, ETC.			
NO CONTAINER LEAKING			
AISLE SPACE IS OPEN AND FREE OF OBSTRUCTION			
STORAGE IS LESS THAN (180 days for SQG, 90 days for LQG)			
WASTE IS SEGREGATED PROPERLY			
NO SMOKING SIGN CLEARLY VISIBLE			
SPILL ABSORBENT MATERIAL PRESENT			
NO STRANGE SMELLS ARE NOTED			
COMMUNICATION OR WARNING DEVICES WORKING			
FLAMMABLES ARE GROUNDED			

COMMENTS:

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Appendix 5:

Sample Hazardous Waste Manifest

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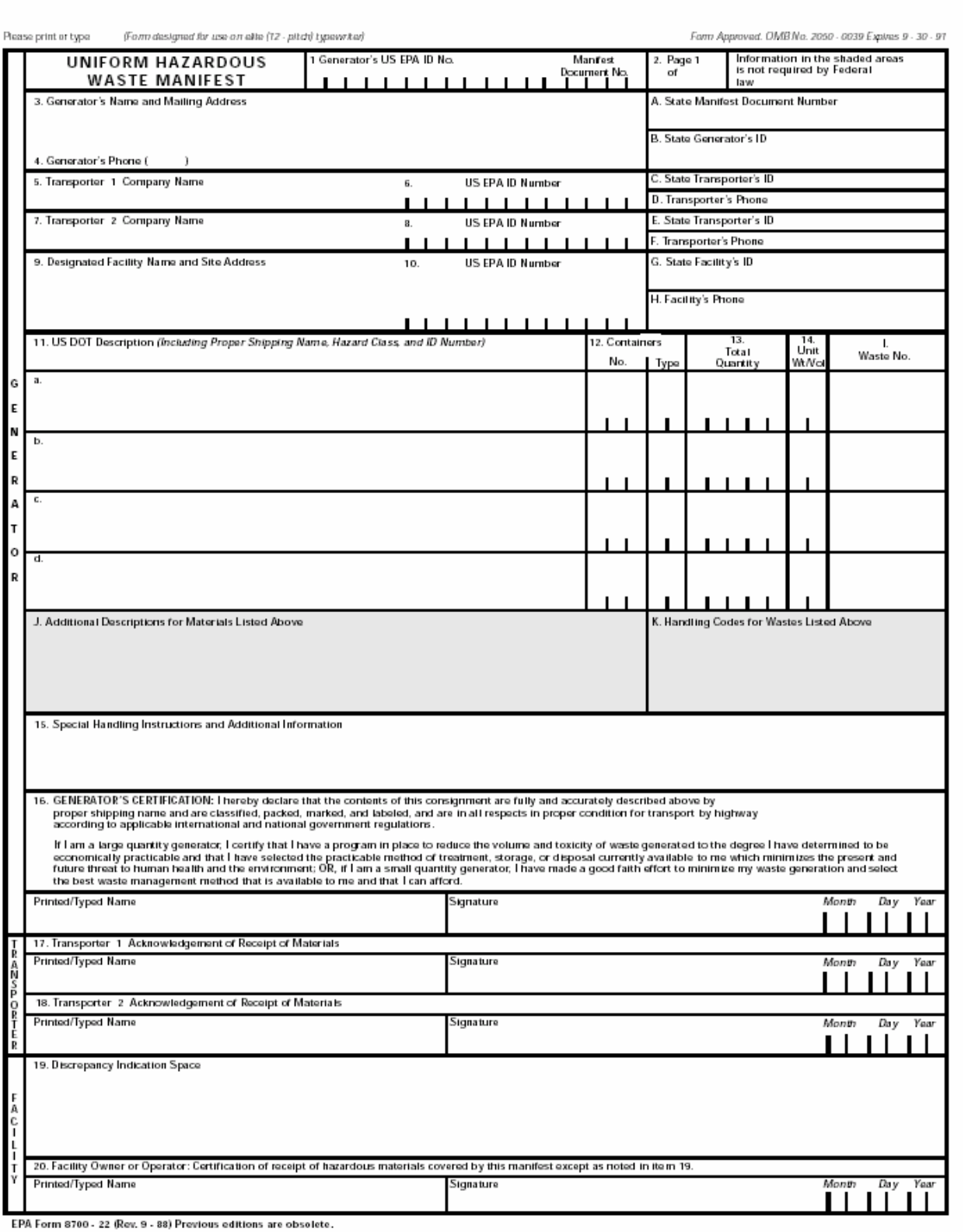
Appendix 5:

SAMPLE HAZARDOUS WASTE MANIFEST



Please print or type (Form designed for use on elite (12 - pitch) typewriter)

Form Approved. OMB No. 2050 - 0039 Expires 9 - 30 - 91

UNIFORM HAZARDOUS WASTE MANIFEST

1 Generator's US EPA ID No. | Manifest Document No. | 2. Page 1 of | Information in the shaded areas is not required by Federal law

3. Generator's Name and Mailing Address

4. Generator's Phone ( )

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name | 6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone

7. Transporter 2 Company Name | 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address | 10. US EPA ID Number

G. State Facility's ID

H. Facility's Phone

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.					
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name | Signature | Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name | Signature | Month Day Year

EPA Form 8700 - 22 (Rev. 9 - 88) Previous editions are obsolete.

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Appendix 6:

Sample Letter

to

Local Authorities

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Appendix 6:

SAMPLE LETTER TO LOCAL AUTHORITIES

_____
(Date)
CERTIFIED MAIL – RETURN RECEIPT REQUESTED

_____
999 Emergency Road
Woodbridge, VA 22193

RE: My Company Inc., 191-Somewhere Road, Woodbridge, Virginia 22193

Dear Sir:

In accordance with the federal and state hazardous waste regulations, My Company Inc. is required to notify you of our shop's hazardous waste activities. My Company Inc. is required to give local police, fire departments, hospitals, and state or local emergency response teams a layout of the shop, so they may become familiar with entrances to roads inside the shop, and possible evacuation routes. A copy of the shop layout is enclosed for your review and should be kept on file at your organization.

My Company Inc. is also required to familiarize local hospitals with the properties of hazardous waste handled at the shop and the types of injuries or illnesses that could result from fires, explosions, or releases at the shop. My Company Inc. deals with _____ waste, and this type of waste could cause _____ if an employee is exposed to it. A list of all the chemicals handled is maintained at the shop and a Material Safety Data Sheet for each can be supplied at your request.

We have also enclosed a copy of our emergency plan. The plan is designed to minimize hazards to human health and the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste to the air, soil or surface water. Please review and retain this plan in your files in the event of an emergency.

Thank you for your cooperation in this matter. Should you have any questions or desire to visit the shop, please contact me at (703) 999-9999.

Sincerely,

Bob Somebody
President
My Company Inc.

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Appendix 7:

Hazardous Waste Emergency List

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Appendix 7: HAZARDOUS WASTE EMERGENCY LIST

Important Phone Numbers:

Police _____

Fire _____

Virginia DEQ NVRO PREP (during normal hours) (703) 583-3800

VA DEM (nights, holidays & weekends) (800) 468-8892

National Response Center (800) 424-8802

Company Name _____

Directions (to shop) _____

_____

Major Waste Types _____

_____

Emergency Coordinator(s) Name(s) & Phone Number(s):

_____

_____

Location of:

Fire Extinguisher(s) _____

Spill Control Material(s) _____

Fire Alarm(s) _____

First Aid Station(s) _____

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Appendix 8:

Sample Emergency Preparedness Tools

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Appendix 8:

SAMPLE EMERGENCY PREPAREDNESS TOOLS

EMERGENCY RESPONSE INFORMATION:

Emergency Coordinator:
Name:

Telephone:

Spill-Control Materials Location(s):

Fire Alarm Location(s) (if present):

Fire Extinguisher Location(s):

Fire Department Telephone:

EMERGENCY RESPONSE PROCEDURES

In the event of a spill:
Contain the flow of hazardous waste to the extent possible, and as soon as possible clean up the hazardous waste and any contaminated materials or soil.

In the event of a fire:
Call the fire department and , if safe, attempt to extinguish the fire using a fire extinguisher.

In the event of a fire, explosion, or other release that could threaten human health outside the shop, or if you know that the spill has reached surface water (e.g., a lake or stream):
Call the National Response Center at its 24-hour hotline (1-800-424-8802). Call the DEQ NVRO's PREP at 703-583-3800 during normal hours. Nights, holidays and weekends call DEM at 800-468-8892. Provide the following information:

Company Name:

Company Address:

US EPA Identification Number:

Date of Accident:

Time of Accident:

Type of accident (e.g., spill or fire):

Quantity of Waste Involved:

Extent of injuries (if any):

Estimated quantity and disposition of recovered materials, if any:

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Appendix 9:

Sample Emergency Plan

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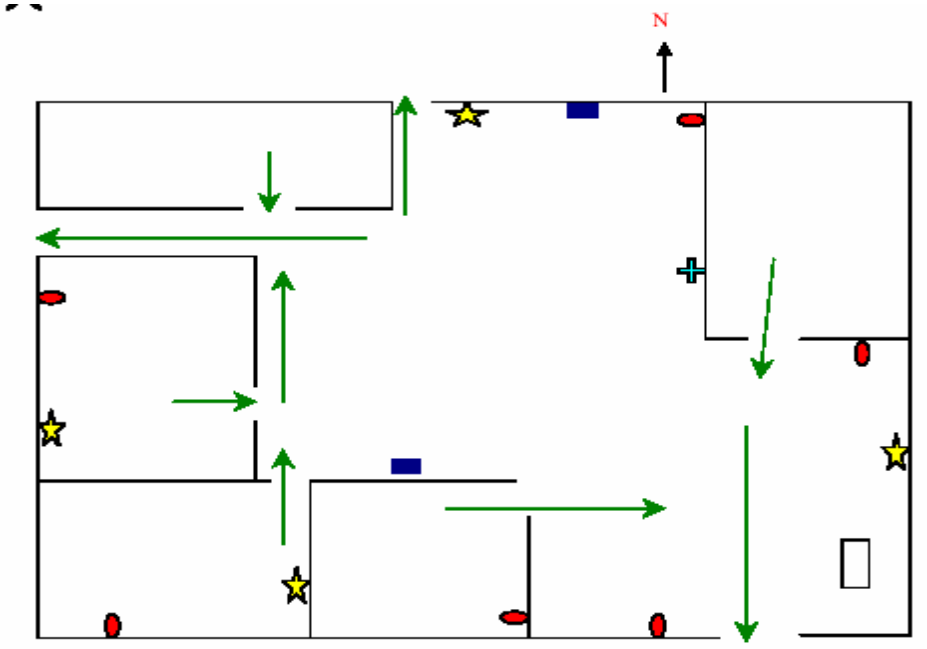
Appendix 9:
SAMPLE EMERGENCY PLAN



My Company Incorporated
191 Somewhere Road
Woodbridge, Virginia 22193

Emergency Coordinator: _____(703) 999-9999
Fairfax Fire Department: (703) 999-9999
CHEMTREC: (800) 424- 9300
Fairfax Police Department: (703) 999-9999
Emergency Response: (703) 999-9999
Hospital: (703) 999-9999

✚ *FIRST AID KIT*
⬬ *FIRE EXTINGUISHERS*
▬ *SPILL KITS*
→ *EXIT ROUTES*
★ *FIRE ALARMS*

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Appendix 10:

Land Disposal Restriction Form

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Land Disposal Restriction Form

There is not a uniform Land Disposal Restriction Form in use today.

This form is available from your waste hauler. Each hauler has developed their own specific form. The forms vary in length from 2 to more than 10 pages.

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Appendix 11:

List of Recyclers for Fluorescent Lamps And Ballasts

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LIST OF RECYCLERS FOR FLUORESCENT LAMPS AND BALLASTS

FLOURESCENT LAMP RECYCLERS

The following is a list of lamp and ballast recyclers. Please note this list is only a partial representation of Recyclers and is updated periodically. This list should not be seen as an endorsement or approval of these facilities. Users of this list are encouraged to research the compliance status of any company they utilize by telephoning the implementing state agency. Should you have questions, please call the Virginia Hazardous Waste Management Branch at 302-739-3689.

Advance Env. Recycling Corp.	Lamp Recyclers, Inc.	Resource Recovery, Inc.
2591 Mitchell Avenue	712 Packerland Drive	2506 35th Avenue SW
Allentown, PA 18103	P.O. Box 10794	Fargo, ND 58104
(215)797-7606	Green Bay, WI 53707-0794	(701) 234-9102
(800) 554-2372	(800) 558-1166	
Bethlehem Apparatus Co.	Lighting Resources, Inc.	Recovery, Inc.
890 Front Street	386 S. Gordon Street	7253 Washington Avenue
Hellertown, PA 18055	Pomona, CA 91766	Edina, MN 55439
(215)838-7034	(800) 572-9253	(612) 828-9722
Compliance Plus, Inc.	Luminaire Recycling, Inc.	Salesco USA
110 Pepperidge Road	2161 University Ave, Suite 206	40 Messina Drive
Portland, CT 06480	St. Paul, MN 55114	Braintree, MA 02184
(203) 342-2174	(612) 649-0079	(800) 368-8878
Dlubak's Glass Co.	Mercury Recovery Services	Salesco USA
274 Saxonburg Road	2021 S. Myrtle	5736 West Jefferson
Natona Heights, PA 15055	Monrovia, CA 91016	Phoenix, AZ 85043
(412) 224-6611	(818) 301-1372	(800) 368-9095
Dynex	Mercury Refining Company	Superior Env. Services
6801 Industrial Loop	790 Watervliet-Shaker Rd	P.O. Box 500
Greendale, WI 53129	Latham, NY 12110	Port Washington, WI 53074
(800) 249-3310	(800) 833-3505	(414) 284-9101
Dynex	Mercury Tech. of Minn., Inc.	USA Lights of Ohio
23460 Industrial Park Drive	2320 County Lane J	5366 Este Avenue
Farmington Hills, MI 48355	White Bear Lake, MN 55110	Cincinnati, OH 45232
(800) 733-9639	(612) 426-2102	(800) 778-6645
Dynex	Mercury Technologies of MN	USA Lights
4751 Mustang Circle	P.O. Box 13	2007 County Road C-2
St. Paul, MN 55112	Pine City Industrial Park	Roseville, MN 55113
(800) 733-9639	Pine City, MN 55063-0013	(612) 628-9370
	(612) 629-7888	
FullCircle Recyclers	Recyclights	
Ron Waxell	2010 E. Hennepin Avenue	
1223 Clopton Bridge	Minneapolis, MN 55413	
Rochester Hills, MI 48306	(612) 378-9571	
(800) 775-1516		
(810) 651-6589		
Global Recycling Technologies	Recycling Technologies, Inc.	
P.O. Box 651	11930 W. Silver Spring Drive	
Randolph, MA 02368	Milwaukee, WI 53225	
(617) 341-6080	(414) 536-5166	

BALLAST RECYCLING SERVICES		
Ensquare, Inc.		
P.O. Box 1056	Attn: John Chilcott	Attn: Frank Sales
Brookline, MA 02146	386 S. Gordon Street	5736 West Jefferson
(617) 776-7320	Pomona, CA 91766	Phoenix, AZ 85043
(612) 828-9722	(714) 622-0881	(800) 368-9095
(800) 572-9253		
Environmental Energy Group		Salesco USA
P.O. Box 50764	Resource Recovery, Inc.	Attn: Steve Walsh
Denton, TX 76206	2506 35th Avenue SW	40 Messina Drive
(817) 383-3632	Fargo, ND 58104	Braintree, MA 02184
(701) 234-9102	(800) 368-8878	
FullCircle Recyclers		
Ron Waxell	Recovery, Inc.	Transformer Service, Inc.
1223 Clopton Bridge	7253 Washington Avenue	74 Regional Drive
Rochester Hills, MI 48306	Edina, MN 55439	Concord, NH 03301
(800) 775-1516	(612) 828-9722	(603) 224-4006
(810) 651-6589		

Appendix 12:

Small Business Environmental Compliance Assistance Loan Fund

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The Virginia Small Business
Environmental Compliance Assistance Fund

The Virginia Small Business Environmental Compliance Assistance Fund (ECAF) is designed to provide Virginia businesses with financing for the purchase of 1) equipment to comply with the federal Clean Air Act, 2) equipment to implement voluntary pollution prevention measures, or 3) equipment or structures to implement voluntary agricultural best management practices (BMPs).

Eligible Borrowers: • Small business as defined in §10.1-1197.1 of the Code of Virginia; e.g. the business employs 100 people or less; and is a small business concern as defined in the federal Small Business Act (15 U.S.C. § 631 et seq), as amended. ***Eligible Project:*** • Project must be certified as eligible by the Department of Environmental Quality (DEQ) for air quality or pollution prevention projects, or by the Department of Conservation and Recreation (DCR) for Agricultural Best Management Practices (BMPs).	***Amounts:*** Up to $100,000 ***Maximum Term:*** Loans will be amortized to match the borrower's ability to repay the loan and/or to coincide with the useful life of the machinery and equipment being purchased or the life of the agricultural BMP being installed, but shall not exceed 10 years. ***Fees:*** Application fee of $30.00 ***Interest Rate:*** 3% Fixed

Some examples of eligible loan uses under the *Small Business Environmental Compliance Assistance Fund*, include:

- High-volume, low-pressure spray guns.
- Dry cleaning machines.
- Alternative curing technologies.
- Ultrasonic cleaning equipment to replace solvent systems.
- Agricultural BMPs that include equipment or structures such as animal waste control facilities and animal waste structure pumping equipment.

Loans **may not** be used to:

- Comply with an enforcement action by DEQ, the State Air Pollution Control Board, the State Water Control Board, the Virginia Waste Management Board, or the Department of Agriculture and Consumer Services.
- Purchase equipment for underground or above ground storage tank replacement/compliance.
- Finance a start-up business.
- Refinance equipment already on site.
- Use as working capital.

Contact Information:

For credit-related questions, please call Department of Business Assistance – **Scott Parsons** – **804 - 371- 8256**.
For questions/issues relating to the project and its environmental impact, please call **Richard Rasmussen**– Department of Environmental Quality – **804 - 698 - 4394**.

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Resources

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RESOURCES

There are various online resources that can help automotive body shops comply with environmental regulations while maintaining or improving business performance, productivity, quality, and safety.

Auto Body Professional Industry Associations
http://www.autobodypro.com/pro_assoc.htm
List of resources and associations.

Coordinating Committee for Automotive Repair—*Green*Link Virtual Shops
http://www.ccar-greenlink.org/cshops/
This site has virtual shops for automotive repair, collision repair, paint mixing, and spray booths. Each virtual shop takes you through all the potential issues and how to properly handle the issues facing a facility with a similar operation.

Virtual Automotive Repair Shop
Copyright © 1996-2004, CCAR®. Provides view of an automotive repair shop.

Virtual Collision Repair Shop
Copyright © 2000-2004, CCAR®. Provides view of a collision repair shop.

Virtual Paint Mixing Room
Copyright © 2000-2004, CCAR®. Provides view of a paint mixing room.

Virtual Spray Booth
Copyright © 2000-2004, CCAR®. Provides view of a spray booth.

Energy Star Small Business
http://www.energystar.gov/index.cfm?c=small_business.sb_index
The joint U.S. EPA-Department of Energy program in partnership with industry helps businesses identify money-saving energy efficiency equipment and practices.

Iowa Waste Reduction Center
http://www.iwrc.org/
The center has several efforts oriented to automotive body shops.

- Auto Body Surface Coating: A Practical Guide to Reducing Air Emissions
- Cost Calculator helps shops determine based on their paint usage the feasibility of HVLP spray guns, LaserTouch® device, automatic gun wash units, and paint thinner (solvent) distillation units.
- STAR® program is dedicated to improving the overall efficiency of manual spray coating operations by enhancing the techniques of spray technicians around the country.

LaserTouch®
http://www.lt-t.com/
The LaserTouch® device, which attaches to any model spray gun, uses two laser beams adjusted to form a single dot when the spray gun is at the correct preset distance from the part. This enables the operator to paint and maintain the correct distance for consistent coverage. The single dot can be used to target the spray pattern on the part that results in an accurate 50% overlap on the painting surface. (Note: DEQ does not endorse or warrant particular vendors.)

National Paints and Coatings Association
http://www.paint.org/index.htm
Provides information about the paints and coatings industry.

Occupational Safety and Health Administration (OSHA) Autobody Repair and Refinishing
http://www.osha.gov/SLTC/autobody/index.html
This site provides information on hazards, OSHA standards, and solutions for the automotive body repair and refinishing industry.

Paints and Coating Resource Center
http://www.paintcenter.org
PCRC provides regulatory and pollution prevention information for shop managers and environmental staff. The Center has a useful online calculator to help shops calculate VOC and HAP amounts in their paints and coatings as described in Section 2 Air Pollution.

Small Business Assistance Program – National Website
http://www.smallbiz-enviroweb.org/
Helps small businesses access environmental compliance and pollution prevention information.

- **Virginia Small Business Assistance Program**
  http://www.deq.virginia.gov/osba/homepage.html
  Offers small businesses free and confidential technical assistance on air quality and related environmental requirements. (More detail below under Virginia DEQ Resources.)

U.S. EPA Design for the Environment Automotive Refinishing Partnership
http://epa.gov/dfe/projects/auto/index.htm
The partnership works with the auto repair industry to identify and encourage the use of safer, cleaner, and more efficient practices and technologies. The site links to resources on best practices for shops as well to information on protective and pollution control equipment.

Waste Reduction Resource Center
http://wrrc.p2pays.org/industry/autorepair.htm
The Center discusses cost-effective strategies to improve environmental performance and worker safety in the automobile repair industry. Information is provided for improved methods to manage vehicle fluids, batteries, tires, solvents and shop rags. Environmentally friendly parts cleaning, surface preparation and coating techniques are also discussed.

Virginia Department of Environmental Quality Resources

DEQ main page http://www.deq.virginia.gov/homepage.html

DEQ Air Program implements and enforces air quality regulations; performs pertinent air quality monitoring, inventory, and planning activities; and houses the Small Business Assistance Program as a non-regulatory technical assistance service. http://www.deq.virginia.gov/air/

Hazardous Waste information regarding type of generators, universal wastes, waste oils, satellite accumulation, contaminated rags and many more
http://www.deq.virginia.gov/waste/hazardous.html

Laws and Regulations administered by DEQ for air water, and waste can be accessed via
http://www.deq.virginia.gov/regulations/homepage.html

Petroleum Program information regarding above and below ground tank, spills, leaks, contacts, etc. http://www.deq.virginia.gov/tanks/

Pollution Response Program (PREP) responds to air, water, and waste pollution incidents in order to protect human health and the environment. PREP works with local emergency responders, other state agencies, and federal agencies, as may be needed to manage pollution incidents. Oil spills, fish kills, and hazardous material releases are examples of incidents that may involve the DEQ PREP Program http://www.deq.virginia.gov/prep/

Recycling and Litter Prevention information about Used Oil, Oil Filters and Antifreeze, Computer & Electronics Recycling, and Waste Tires
http://www.deq.virginia.gov/recycle/recycle.html

Small Business Assistance Program is a non-regulatory program within DEQ that offers small businesses free and confidential technical assistance on air quality and related environmental requirements http://www.deq.virginia.gov/osba/homepage.html. Relevant to auto body shops are the following:

- **Small Business Assistance Program Fact Sheets**: Best Management Practices for Automotive Refinishing Shops, Waste Reduction Tips for Service Stations & Automotive Repair Shops, and Understanding Regulations on Solvent Cleaning Equipment: What You Need to Know to Comply
- **Small Business Environmental Compliance Loan Fund** for the purchase and installation of voluntary pollution prevention and control equipment
http://www.deq.virginia.gov/osba/finance.html

The NVRO is the primary point of contact for most people doing business with the agency in the region. Regional activities include: permits, remediation, air quality, water quality, and compliance, monitoring and enforcement.
The Northern Virginia Regional Office serves the counties of Arlington, Caroline, Culpeper, Fairfax, Fauquier, King George, Loudoun, Louisa, Madison, Orange, Prince William, Rappahannock, Spotsylvania and Stafford; and the cities of Alexandria, Fairfax, Falls Church, Fredericksburg, Manassas and Manassas Park.

NVRO Program Contacts

Program	Contact Name	Title	Phone
NVRO Director	Jeffrey A. Steers	Regional Director	(703) 583-3810
NVRO Deputy Director	John Bowden	Deputy Regional Director	(703) 583-3880
Compliance & Monitoring			
Air	Dennis Batts	Air Compliance Manager	(703) 583-3850
Air Check Virginia	Mike Thompson	Air Check Program Manager	(703) 583-3866
Waste	Richard Doucette	Waste Compliance Manager	(703) 583-3813
Water	Edward Stuart	Water Compliance Manager	(703) 583-3876
PREP	Patty Greek	PREP Coordinator	(703) 583-3864
Permitting			
Air	Terry Darton	Air Permit Manager	(703) 583-3845
VWPP	Joan Crowther	Water Resources Development Supervisor	(703) 583-3828
Water	Tom Faha	Water Permit Manager	(703) 583-3846
Remediation			
Remediation	Cynthia Sale	Remediation Manager	(703) 583-3830
Brownfields	Cynthia Sale	Remediation Manager	(703) 583-3830
Tank Compliance Supervisor	Steve Hughes	Tank Program Manager	(703) 583-3809

http://www.deq.virginia.gov/regions/northern.html

Northern Virginia Auto Body Shop Self-Certification Package

Virginia Department of Environmental Quality
Northern Virginia Regional Office
13901 Crown Court,
Woodbridge, VA 22193
(703) 583-3800
http://www.deq.virginia.gov/

Published January 2006

Virginia Auto Body Self-Certification Package

This package includes the following three forms:

- Non-Participation Form
- Self-Certification Checklist
- Return-to-Compliance Plan

Instructions for filling out these forms, and for reading the corresponding Compliance Assistance Workbook, can be found in the introduction to this notebook. To recap, the **six steps** are:

Step 1: Complete the Registration form found in Appendix 1 and use the self–addressed envelope provided at the back of the workbook. Mail this to DEQ by January 9, 2006. <u>This is MANDATORY!!</u>

Step 2: Decide If You Will Participate in the Auto-Body Self-Certification Program.

- If you are planning to participate, please complete, sign and mail the Participation / Non-Participation Form found on the next page to DEQ. (Just fold, tape and stamp the form – address is on the back.)
- If you are not going to participate, please complete, sign and mail the Participation / Non-Participation Form to DEQ. (Just fold, tape and stamp the form – address is on the back.)

Step 3: Review the Workbook.

Step 4: Complete the Self-Certification Checklist.

Step 5: Fill out the Return-to-Compliance Plans, if necessary.

Step 6: Sign and Submit All Forms.

You may want to make photocopies of each of these forms before you fill them out, in case you make a mistake and want to start over. Always make copies of what you are submitting to DEQ for your records, and keep for 3 years. If you need extra copies, or have any questions about how to fill out the forms, contact DEQ's Northern Virginia Regional Office at (703) 583-3800. You may also find copies of these forms on line at <u>www.deq.virginia.gov</u>.

Participation / Non-Participation Form

The Northern Virginia Auto Body Self-Certification Program is a voluntary program that benefits auto body shops that operate in the state of Virginia. Your facility is eligible to participate in the program if it meets one or more of the following eligibility requirements:

- Your shop has operations involving collision repair; vehicle painting, paint stripping or sanding; body work; antique restoration; and/or student training in any of these areas
- Your shop has painting operations, as part of a new or used car dealership or general auto repair shop

☐ **If you wish to participate in the Self-Certification Program and your Self-Certification Checklist is enclosed. Please check this BOX and complete, sign and return this form.**

☐ **If you wish to participate in the Self-Certification program and you will submit your Self Certification Checklist at a later date. Please check this BOX and complete, sign and return this form.**

☐ **If your facility does not meet the above description of an auto body or collision repair shop, or if you choose not to participate in the program, please check this BOX, fill in the information below then complete, sign and return this form.**

* **In either case you should have returned your completed Registration Form for Auto body shops to DEQ by January 9, 2006.**

Reason for Not Participating

Check the box that applies to you:

❑ This facility is not participating in the Auto Body Certification Program because no automotive-refinishing operations (listed at the top of this page) occur at this address. If you check this box, please check off which activities do occur at this address:

❑ Auto mechanical repair	❑ Auto inspection
❑ Auto glass replacement	❑ Car wash
❑ Tire service	❑ Auto Dealership
❑ Other	

❑ This shop conducts automotive refinishing activities, but is choosing not to participate in the Auto Body Certification Program. I am aware that by choosing not to participate, I will not be able to take advantage of the benefits of the program.

Facility Information

Facility Name: _____

Facility Street Address: _____ Phone #: _____

_____ Fax #: _____

City/Town: _____

State: _____

Zip Code: _____

Contact Person: _____ Owner: _____

Signature

I understand that removal from this mailing list does not relieve this facility/shop of the responsibility to comply with its environmental requirements and registering the shop (if an auto body shop).

Signature: _____ Date: _____

When complete, remove form from booklet; fold in thirds, secure with tape and mail to address on reverse side by January 9, 2006.

Fold

_____

_____

_____

_____

Virginia Department of Environmental Quality
Northern Virginia Regional Office
Attn. Auto Body Self-Certification Program
13901 Crown Court,
Woodbridge, VA 22193

Fold

Contents
Self-Certification Checklist

Section 1. General Facility Information
Section 1.A. Environmental Release
Section 2. Air Pollution
Section 3. Hazardous Waste, Universal Waste and Used Oil
Section 4. Solid Waste
Section 5. Water Pollution
Section 6. Recycling

Directions:

Please read the Auto Body Compliance Assistance Workbook (the Workbook) and fill out the form below. Answer all questions, unless you are directed to skip a question. Do *not* answer questions that you are directed to skip. Mark each box with a dark check mark and avoid stray marks on the checklist pages.

For each requirement question (Req) on the Facility Self-Certification Checklist that you answer as "out of compliance", you must complete and submit a Return-to-Compliance (RTC) Plan on the RTC form(s) at the end of the checklist. A section for notes is provided at the end of each section of the checklist for your convenience, if you wish to take notes.
If you have any questions, call DEQ's Northern Virginia Regional Office at (703) 583-3800.

Key to Codes in the Checklist:

The following codes are used to designate different types of questions:

- **(Req)** = Required Compliance Measure
- **(Req - CESQG)** = Compliance Measure is required only for Conditionally Exempt Small Quantity Generators of Hazardous Waste (CESQGs)
- **(Req - SQG)** = Compliance Measure is required only for Small Quantity Generators of Hazardous Waste (SQGs)
- **(Req – CESQG and SQG)** = Compliance Measure is Required both for CESQGs and SQGs
- **(BMP)** = Best Management Practice – practice is not required by regulations, but strongly suggested
- **(P2)** = Pollution Prevention Measure – practice contributes to source reduction. Questions marked P2 are not required.

Questions marked in **bold** indicate requirements.

Unless otherwise noted, for required compliance measures, a "Yes" response indicates your shop is in compliance and a "No" response indicates your shop maybe out of compliance. All questions are referring to the ***current conditions*** at the shop.

Virginia Department of Environmental Quality
Northern Virginia Auto Body Self-Certification Checklist

Section 1: General Facility Information

1.1 Date Checklist Completed (mm/dd/yyyy): _ _ /_ _ / _ _ _ _

1.2 Business Name: _____

1.3 Alternate Business Names (if Any): _____

_____

1.4 Street Address: _____

1.5 City, Zip: _____

1.6 Mailing Address (if different from above): _____

1.7 Mailing Address City, Zip: _____

1.8 Business Phone Number: (_____)_____ -- _____

1.9 Business Fax Number: (_____)_____ -- _____

1.10 Business Email (if any): _____

Section 1.A.1 Environmental Releases

Please read the entire Reporting releases of petroleum products and chemicals section (Section A. 1.6) of the Workbook on p. 1-16 and 1-17 before you complete the questions below.

1.A.1 Has your shop had any releases of petroleum products or chemicals in the last 12 months?

☐ **Yes** ☐ **No** ☐ **Don't Know**

1.A.2 **If your shop has had environmental releases, have you reported them to DEQ? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

Section 2: Air Pollution

Please read the entire Air Pollution Section (Section 2) in the workbook before you complete the questions below.

General

2.1 **Is your shop creating an odor or nuisance outside your shop's property boundary? (Req)**

☐ **Yes (out of compliance)** ☐ **No** ☐ **Don't Know**

Sanding and Painting Dust

Refer to Sections 4.4 in the workbook.

2.2 Does your shop generate sanding and/or painting (overspray particulate) dust?

☐ **Yes** ☐ **No - *Skip to 2.7*** ☐ **Don't Know**

2.3 **Do you take reasonable precautions to prevent any airborne sanding or painting dust (i.e., fugitive dust) from leaving the building? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

2.4 Does your shop control fugitive dust emissions from the facility using a specific device?

☐ **Yes** ☐ **No - *Skip to 2.7*** ☐ **Don't Know**

2.5 Does the dust collection equipment discharge to the atmosphere?

☐ **Yes** ☐ **No** ☐ **Don't Know**

2.6 What type of dust control measure is adopted? *(Check all that apply)*

☐ Ventilated sander (dustless vacuum) system (BMP)

☐ Wet sanding

☐ Other (*please specify*) _____

Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPS)

Refer to Section 2.5, 2.6 and 2.7 in the workbook.

2.7 **Does your shop use <u>only</u> coatings that comply with state and federal VOC content limitations, as shown in the table below? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

Maximum Volatile Organic Compound (VOC) Content for Automobile Refinish Coatings		
Coating category	***Grams VOC per liter***	***Equivalent Pounds VOC per gallon***
Pretreatment wash primers	*780*	*6.5*
Primers/primer surfacers	*575*	*4.8*
Primer sealers	*550*	*4.6*
Single stage- topcoats	*600*	*5.0*
2 stage basecoat/clearcoat [topcoat]	*600*	*5.0*
3 or 4-stage basecoat/clearcoat	*625*	*5.2*
Multi-colored topcoats	*680*	*5.7*
Specialty coatings	*840*	*7.0*

2.8 Does your facility avoid any use of methylene chloride-based paint strippers? (BMP, P2)

☐ **Yes** ☐ **No** ☐ ***Don't Know***

2.9 Is all painting carried out in a spray booth using proper air pressures? (BMP)

☐ **Yes** ☐ **No** ☐ **Don't Know**

2.10 **Do your painters and technicians use any of the following painting techniques and no others? If so, indicate ones used. (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

(Check all that apply)

☐ **Any non-atomized application technique (e.g., Flow/curtain coating, Dip coating, Roller coating, Brush coating, Cotton-tipped swab application coating, Electrodeposition coating, etc.)**

☐ **High Volume Low Pressure (HVLP) spraying;**

☐ **Electrostatic spray;**

☐ **Airless spray;**

☐ **Any other coating application technique that the person has demonstrated and DEQ has determined achieves emission reductions equivalent to HVLP or electrostatic spray (Please specify)** _____

☐ **Airbrush application methods for graphics, stenciling, lettering, and other identification markings ***

☐ **An application of coatings sold in non-refillable aerosol containers and automotive touch-up repair finish materials (areas less than 1" in diameter) ***

(Please specify) _____

(**These two application techniques are exempt from the regulatory requirements on air emissions)*

2.11 **Does your shop clean the spray guns using any of the following methods and no other? If so, indicate ones used. (Req)**

☐ **Yes** ☐ **No (out of compliance) -** ***Skip to 2.13*** ☐ **Don't Know**

(Check all that apply)

☐ **Use of an enclosed spray gun cleaning system that is kept closed when not in use.**

☐ **The unatomized discharge of solvent into a paint waste container that is kept closed when not in use.**

☐ **The disassembly of the spray gun and cleaning in a vat that is kept closed when not in use.**

☐ **The atomized spray into a paint waste container that is fitted with a device designed to capture atomized solvent emissions.**

2.12 Does your shop use a spray gun cleaning system that recirculates the cleaning solvent or collects the solvent for proper disposal? (BMP)

☐ **Yes** ☐ **No** ☐ **Don't Know**

2.13 **Does your shop store cloth and paper, or other absorbent applicators, moistened with coatings, solvents or cleaning solvents in closed, non-absorbent, no-leaking containers? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

2.14 Does your shop use cold solvent cleaners?

☐ **Yes** ☐ **No - *Skip to 2.15*** ☐ **Don't Know**

2.14 (a) **Is the vapor pressure of the solvent used less than 1 mmHg at 68°F (20°C)? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

2.15 **Does your shop store fresh and used coatings, solvents, and cleaning solvents in non-absorbent, non-leaking containers? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

2.16 **Does your shop keep containers for fresh and used coatings, solvents, and cleaning solvents closed at all times except when filling or emptying? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

2.17 **Does the shop during handling and transfer procedures minimize spills of coatings, solvents and cleaning solvents? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

2.18 Does your shop use detergents, high-pressure water, or other non-VOC cleaning options to clean coating lines and containers when practical? (BMP, P2)

☐ **Yes** ☐ **No** ☐ **Don't Know**

2.19 Does the shop reuse excess coating? (BMP, P2)

☐ **Yes** ☐ **No** ☐ **Don't Know**

2.20 Does your auto body shop have any **stationary** fuel-burning equipment (i.e. gas/oil-fired heaters, stationary compressor engines, emergency electrical generators, gas/oil-fired drier, etc.)? If yes, please list the equipment with fuel type(s) and either maximum fuel use capacity or output rating of each piece of equipment.

Type of Equipment	**Fuel**	**Maximum Fuel Use Capacity/Output Rating**

Record Keeping

Refer to Sections 2.8 and 2.9 in the workbook.

2.21 Does your shop keep the following records at the shop for a period of at least 2 years:

2. 21 (a) The name, identification number and manufacturer of each coating, reducer, catalyst, surface preparation product, and cleanup solvent used at the shop; (BMP)

☐ **Yes** ☐ **No** ☐ **Don't Know**

2. 21 (b) The volume of each coating, reducer, surface preparation product, and cleanup solvent used at the shop each month; (BMP)

☐ **Yes** ☐ **No** ☐ **Don't Know**

2. 21 (c) Certified Product Data Sheets showing the VOC content, in pounds of VOC per gallon of each material (coating and surface preparation product used? (BMP)

☐ **Yes** ☐ **No** ☐ **Don't Know**

2.21 (d) **Documentation showing the VOC content of the coatings calculated according to formulas found in the compliance assistance workbook. (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

2.22 **Do you have records of all refrigerant purchases, sales, on-site recycling and on-site or off-site reclamation for the last 3 years? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

2.23 **Do you have records to show that the recover/recycle or recover-only equipment for motor vehicle air conditioners is approved by EPA? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

Training Program

Refer to Sections 2.8 and 2.9 in the workbook.

2.24 **Does your shop employ a manufacturer approved training program in the proper use and handling of coatings, solvents and waste products to minimize air emissions? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

2.25 Are the auto body painters in your shop fully trained in proper spraying techniques to minimize overspray? (P2)

☐ **Yes** ☐ **No** ☐ **Don't Know**

2.26 **Are your employees who handle refrigerants (like CFCs) from air conditioning systems trained and certified by an EPA-accredited program? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

Section 3: Hazardous Waste, Universal Waste and Used Oil

Please read the entire Hazardous Waste, Universal Waste and Used Oil section (Section B) of the Workbook and complete the Hazardous Waste Identification Worksheet on p. 3-8 before you complete the questions below.

Review the types of waste that you checked Yes in column of Hazardous Waste Identification Worksheet on p. 2-9 of the Workbook. For each type of waste you generate in the last 12 months, you must determine whether or not the waste is hazardous by taking one of the following steps:

- ***Examine the ingredients and the hazardous characteristics for your wastes by reviewing information in the Workbook;***
- ***Review product labels and/or Material Safety Data Sheets (MSDS) for ingredients and warnings of dangerous characteristics (i.e. flammable, corrosive, reactive, toxic) of the products you use;***
- ***Testing a representative waste sample; or***
- ***Using others methods, such as consulting your hazardous management vendors or asking DEQ.***

3.1 Does your shop generate any hazardous waste?

☐ **Yes** ☐ **No - *Skip to 3.47*** ☐ **Don't Know**

3.2 **Has your shop conducted a complete, accurate hazardous waste determination for each waste it generates or determined, by knowledge, if the wastes are regulated hazardous wastes? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

3.3 **Has your shop tested potentially hazardous wastes for which a knowledge-based determination cannot be made? (Req)**

☐ **Yes** ☐ **No (out of compliance) - *Skip to 3.4*** ☐ **Don't Know**

3. 3 (a) **Has your shop retained records of all test results utilized to make a hazardous waste determination for 3 years? (Req - SQG)**

☐ **Yes** ☐ **No (SQG-out of compliance)** ☐ **Don't Know**

3.4 Does your shop track hazardous waste accumulation totals? (BMP)

☐ **Yes** ☐ **No** ☐ **Don't Know**

3.5 Does your shop generate any acute hazardous waste?

☐ **Yes** ☐ **No - *Skip to 3.7*** ☐ **Don't Know**

3.6 If yes, is the maximum amount of acute hazardous waste accumulated on site less than 1 kg (2.2 pounds)?

☐ **Yes** ☐ **No** ☐ **Don't Know**

Generator Status - refer to Section 3.1.2 in the workbook.

GUIDELINES FOR DETERMINING GENERATOR STATUS			
	CESQG	SQG	LQG
Maximum Amount of Hazardous Waste Generated in any calendar month	Less than 25 gallons (220 pounds)	25-300 gallons (220-2,200 pounds)	More than 300 gallons (2,200 pounds)
Amount of Hazardous Waste Accumulated at any one time	Less than 300 gallons (2,200 pounds)	Less than 1595 gallons (13,000 pounds)	More than 1595 gallons (13,000 pounds)
Amount of Acute Hazardous Waste Accumulated	Less than 1 kg (2.2 pounds)	Less than 1 kg (2.2 pounds)	More than 1 kg (2.2 pounds)

3.7 What is your shop's hazardous waste generator status? ☐ CESQG ☐ SQG ☐ LQG*

****This checklist is designed for small shops, and therefore does not specify requirements for LQGs.***

3.8 **Does your facility have an EPA identification number? (Req – SQG and LQG)**

☐ **Yes** ☐ **No - *Skip to 3.9 (*SQG or LQG, out of compliance.)** ☐ **Don't know**

☐ **SQG (Req) – Please list the number** #_____

☐ **CESQG (not Req) – If your shop has a number, please list it #**_____

☐ **NA - No EPA identification number**

If your shop is close to any of the threshold levels for determining generator status, you will need to go back and recalculate your numbers if you used the conversion factor of 8.5 to convert your pounds of liquid waste into gallons. The conversion factor of 8.5 for liquid wastes is only an estimate provided for the convenience of most shops, and may not be precise enough for your particular shop to determine its generator status. As a result, you may need to use more exact numbers to convert pounds to gallons or weigh the containers. The total weight [including the container] of the shipment listed on the manifest/bill of laden will determine your classification. Refer to Section 3.1.2 in the workbook.

Hazardous Waste Shipment

If you are a CESQG, refer to Section 3.2.4 in the workbook. If you are a SQG, refer to Section 3.3.4 in the workbook

3.9 **Does your shop send all hazardous wastes to a permitted hazardous waste treatment, storage, or disposal facility or a state authorized facility? (Req – CESQG and SQG)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

3.10 **Does your shop maintain required* waste shipment records? (Req – CESQG and SQG)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

**Requirements specific to each generator status are noted below*:

- *SQGs are required to maintain hazardous waste manifests*
- *CESQGs may maintain either hazardous waste manifests or other documentation (e.g., bill of ladings, receipts, tolling agreement, letter of acceptance)*

3.11 **Does your shop maintain required records for hazardous waste shipment for at least 5 years? (Req – CESQG and SQG)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

Hazardous Waste Management

If you are a CESQG, refer to Section 3.2.2 in the workbook. If you are a SQG, refer to Section 3.3.1 in the workbook.

3.12 **Are all hazardous waste containers properly* labeled? (Req – CESQG and SQG)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

**Requirements specific to each generator status are noted below*:

- *SQGs are required to label all hazardous waste containers in the storage area with the words "Hazardous Waste"*
- *SQGs are required to label all hazardous waste containers at the satellite accumulation area with the words "Hazardous Waste" or with other words that identify the contents of the container*
- *CESQGs may label hazardous waste containers with the words "Hazardous Waste" or with other words that identify the contents of the container*

3.13 **Have you, the generator, ensured that incompatible wastes have not been placed in the same container? (Req –SQG)**

☐ **Yes** ☐ **No (SQG out of compliance)** ☐ **Don't Know**

3.14 **Are all hazardous waste containers closed except when materials are being added or removed? (Req – CESQG and SQG)**

☐ **Yes** ☐ **No (CESQG and SQG out of compliance)** ☐ **Don't Know**

3.15 **Are containers in good condition? (No leaks, corrosion, bulges, etc.) (Req – SQG)**

☐ **Yes** ☐ **No (SQG out of compliance)** ☐ **Don't Know**

3.16 **Are containers handled in a manner to prevent rupture, leaks, and spills? (Req – SQG)**

☐ **Yes** ☐ **No (SQG out of compliance)** ☐ **Don't Know**

3.17 **Are containers and/or their liners compatible with the hazardous waste they hold? (Req – SQG)**

☐ **Yes** ☐ **No (SQG out of compliance)** ☐ **Don't Know**

3.18 **Are all used containers cleaned before adding hazardous wastes that would be incompatible with materials previously stored in the containers? (Req – SQG)**

☐ **Yes** ☐ **No (SQG out of compliance)** ☐ **Don't Know**

3.19 **Are containers holding incompatible waste kept apart by physical barriers (e.g., a dike, berm, or wall)? (Req – SQG)** ***(If the shop has no incompatible waste, mark "N/A")***

☐ **N/A** ☐ **Yes** ☐ **No (SQG out of compliance)** ☐ **Don't Know**

Hazardous Waste Accumulation and Storage

If you are a CESQG, refer to Section 3.2.3 and 3.2.5 in the workbook. If you are a SQG, refer to Section 3.3.2 and 3.3.5 in the workbook.

3.20 Where is the hazardous waste being accumulated/stored?

(Check all that apply, and then fill in appropriate section(s))

☐ Satellite Accumulation Area(s) - *Answer Questions 3.21-3.25 and then skip to 3. 30*

☐ A less-than-180-Day Accumulation Area – *Skip to Question 3.26*

Satellite Accumulation Area:

3.21 Are all satellite accumulation containers under control of the operator generating the waste and at or near the point of generation?

☐ **Yes** ☐ **No** ☐ **Don't Know**

3.22 Is the amount of hazardous waste stored at each satellite accumulation area 55 gallons or less?

☐ **Yes** ☐ **No** ☐ **Don't Know**

3.23 Is the amount of acute hazardous waste stored at each satellite accumulation area 1 kg or less?

☐ **Yes** ☐ **No** ☐ **Don't Know**

3.24 Is the satellite accumulation container closed?

☐ **Yes** ☐ **No** ☐ **Don't Know**

3.25 Is the satellite accumulation container in good condition?

☐ **Yes** ☐ **No** ☐ **Don't Know**

3.25 (a) Have all containers or waste quantities in excess of 55-gallons been properly labeled, dated and moved to a <180-day accumulation area within 3 days of exceeding that quantity?

☐ **Yes** ☐ **No** ☐ **Don't Know**

Hazardous Waste Accumulation Area

3.26 **Is the accumulation area inspected weekly for signs of spills, leaks or container deterioration? (Req - SQG)**

☐ **Yes** ☐ **No (SQG out of compliance)** ☐ **Don't Know**

3.27 Does your shop keep written records of its **weekly** inspections of the hazardous waste accumulation area for 5 years? (BMP)

☐ **Yes** ☐ **No** ☐ **Don't Know**

3.28 **Is each container labeled with the appropriate* date? (Req - SQG)**

☐ **Yes** ☐ **No (SQG out of compliance)** ☐ **Don't Know**

**If the storage container is not for satellite accumulation, the date needs to be recorded as soon as the first drop of waste is added. If the container is a satellite accumulation container, it needs to be dated as soon as 55 gallons are reached and it is moved to the storage area.*

3.29 **Is your shop shipping the hazardous waste off-site according to the 180-day storage time limit (i.e., no container can remain on site for more than 180 days after its accumulation start date unless the receiving TSD is 200 or more miles away)? (Req-SQG)**

☐ **Yes** ☐ **No (SQG out of compliance)** ☐ **Don't Know**

3.30 **Has information on your shop and its waste accumulation areas been submitted to local police, fire departments, and hospitals? (Req - SQG)**

☐ **Yes** ☐ **No (SQG out of compliance)** ☐ **Don't Know**

3.31 **Does your shop maintain an internal communication system if the accumulation area is remote? (Req - SQG)** ***(If there is an accumulation area but it is not remote, mark "N/A")***

☐ **N/A** ☐ **Yes** ☐ **No (SQG out of compliance)** ☐ **Don't Know**

3.32 **Does your shop maintain a telephone to summon emergency response teams? (Req - SQG)**

☐ **Yes** ☐ **No (SQG out of compliance)** ☐ **Don't Know**

3.33 **Does your shop maintain fire extinguishing or other fire control equipment? (Req - SQG)**

☐ **Yes** ☐ **No (SQG out of compliance) - *Skip to 3.35*** ☐ **Don't Know**

3.34 **Does your shop periodically test fire extinguishing/fire control equipment? (Req - SQG)**

☐ **Yes** ☐ **No (SQG out of compliance)** ☐ **Don't Know**

3.35 Is the accumulation area itself secure and protected from storm water? (BMP)

☐ **Yes** ☐ **No** ☐ **Don't Know**

3.36 Does the hazardous waste storage area employ secondary containment (i.e. spill/leak containment capability)? (BMP)

☐ **Yes** ☐ **No** ☐ **Don't Know**

3.37 Does the storage area contain ignitable or reactive wastes?

☐ **Yes** ☐ **No - *Skip to 3.40*** ☐ **Don't Know**

3.38 **Are ignitable and reactive wastes protected from any materials or conditions that could cause them to ignite or react? (Req - SQG)**

☐ **Yes** ☐ **No (SQG out of compliance)** ☐ **Don't Know**

3.39 Are flammable material drums grounded? (BMP)

☐ **Yes** ☐ **No** ☐ **Don't Know**

3.40 **Does aisle space allow unobstructed movement of personnel and emergency equipment? (Req - SQG)**

☐ **Yes** ☐ **No (SQG out of compliance)** ☐ **Don't Know**

3.41 Does your shop have a hazardous waste tank?

☐ **Yes** ☐ **No - *Skip to 3.43*** ☐ **Don't Know**

3.42 **Are all hazardous waste tanks labeled and closed? (Req - SQG)**

☐ **Yes** ☐ **No (SQG out of compliance)** ☐ **Don't Know**

3. 42 (a) Does the hazardous waste tank have secondary containment?

☐ **Yes** ☐ **No** ☐ **Don't Know**

3. 42 (b) Is the tank inspected daily and inspections recorded?

☐ **Yes** ☐ **No** ☐ **Don't Know**

3. 42 (c) Does the tank have an automatic overfill alarm or overfill protection mechanism?

☐ **Yes** ☐ **No** ☐ **Don't Know**

(**Note**: The tank requirements are quite extensive. It is recommended facilities contact DEQ's Northern Virginia Regional Office Hazardous Waste Inspectors at [703] 583-3800.)

Hazardous Waste Emergency Planning and Training

If you are a CESQG, refer to Sections 3.2.5 and 3.2.6 in the workbook. If you are a SQG, refer to Sections 3.2.5 and 3.3.6 in the workbook.

3.43 **Does your shop have a program that trains employees who handle hazardous waste in proper waste management procedures? (Req - SQGs)**

☐ **Yes** ☐ **No (SQG out of compliance)** ☐ **Don't Know**

3.44 **Does your shop have records indicating that an employee-training program is occurring? (Req-SQGs)**

☐ **Yes** ☐ **No (SQG out of compliance)** ☐ **Don't Know**

3.45 **Does your shop have a sign by the telephone that lists telephone numbers of the local fire department, location of emergency equipment, and the phone number of one of more people who are on standby and who will coordinate an emergency response? (Req-SQGs)**

☐ **Yes** ☐ **No (SQG out of compliance)** ☐ **Don't Know**

3.46 Does your shop have a written contingency plan designed to help the shop reduce hazards associated with the possibility of an explosion, fire, or unplanned/accidental release of hazardous materials? (BMP)

☐ **Yes** ☐ **No** ☐ **Don't Know**

Universal Wastes ***Refer to Section 3.4 in the workbook***

3.47 Does your shop handle <u>any</u> of the following materials?

☐ **Yes** ☐ **No – Skip to 3.56** ☐ **Don't Know**

(Check all that apply)

☐ Batteries ☐ UV Lights

☐ Mercury Thermostats ☐ Mercury Switches [P2]

☐ Fluorescent lights other than those that have been identified as low Mercury

☐ Other universal wastes (Please specify: _____)

Note: *If a shop has chosen to manage any of these wastes as a hazardous waste instead of a universal waste, add them to the hazardous waste table above in the "other wastes" section and skip to 3.56.*

3.48 Are your shop employees aware that these materials need to be handled according to requirements for universal wastes?

☐ **Yes** ☐ **No** ☐ **Don't Know**

3.49 **Are all universal wastes stored in closed containers that prevent the release of the waste or waste components? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

3.50 **Are all universal waste containers labeled with the type of waste contained? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

3.51 **Are all universal wastes accumulated for no longer than one year from the date generated? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

3.52 **Does your shop maintain records of the generation date for universal wastes? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

3.53 **Does your shop ensure all employees handling universal wastes have been provided information on proper handling and emergency procedures? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

3.54 **Does your shop send all universal wastes to another universal waste handler, a permitted facility, or a foreign destination? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

3.55 Does your shop maintain shipping manifests or other shipping papers for universal wastes?

☐ **Yes** ☐ **No** ☐ **Don't Know**

Used Oil and Fuel Tanks

Refer to Section 3.5 in the workbook.

3.56 Does your shop have one or more above ground tanks for fuel or oil?

☐ **Yes*** ☐ **No** ☐ **Don't Know**

3.57 Does your shop have one or more underground storage tanks for fuel or oil?

☐ **Yes*** ☐ **No** ☐ **Don't Know**

** If the shop has ASTs or USTs, refer them to tank regulations not included in this checklist.*

3.58 Does your shop generate used oil?

☐ **Yes** ☐ **No - *Skip to 3.64*** ☐ **Don't Know**

3.59 **Are all used oil containers and tanks labeled with the words "Used Oil"? (Req)**

☐ **Yes** ☐ **No** ☐ **Don't Know**

3.60 **Does your shop send used oil for recycling? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

3.61 Does your shop keep manifests or bills of lading for shipments of used oil? (BMP)

☐ **Yes** ☐ **No** ☐ **Don't Know**

3.62 **Does your shop avoid mixing used oil and hazardous waste, unless the hazardous waste is ignitable, like parts cleaning solvent (petroleum naphtha)? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

3.63 **If you are burning used oil in a space heater is the used oil generated by your or does it meet the standards for burning used oil from off-site facilities established under 40 CFR Part 279? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

Pollution Prevention *Refer to Section 3.6 in the workbook.*

Note: *Answer the following questions based on current practices*

3.64 Does your shop pre-clean parts with mechanical techniques (e.g., a squeegee, rag or wire brush) to reduce use of solvent? (P2)

☐ **Yes** ☐ **No** ☐ **Don't Know**

3.65 Does your shop use solvent recycler to reuse thinners, gun cleaners, or other solvents? (P2)

☐ **Yes** ☐ **No** ☐ **Don't Know**

3.66 Does your shop store partially used absorbents in closed, labeled containers for reuse? (P2)

☐ **Yes** ☐ **No** ☐ **Don't Know**

3.67 Does your shop keep containers of liquids, including parts washers, covered and cool to reduce evaporation? (P2, BMP)

☐ **Yes** ☐ **No** ☐ **Don't Know**

3.68 Does your shop avoid buying high mercury florescent lamps? (P2)

☐ **Yes** ☐ **No** ☐ **Don't Know**

3.69 Does your shop reuse or recycle all used electronics? (P2) *(If the shop does not generate waste electronics, mark "N/A")*

☐ **N/A** ☐ **Yes** ☐ **No *** ☐ **Don't Know**

Be sure to mention how the shop can send functioning electronics for reuse, or recycling as long as the electronics are intact. For more information go to:

http://www.deq.virginia.gov/ecycling/

3.70 Does your shop take steps to avoid drips and spills of used oil? (P2)

☐ **Yes** ☐ **No** ☐ **Don't Know**

3.71 Does your shop keep spill absorbent material available to clean up spills (P2)?

☐ **Yes** ☐ **No** ☐ **Don't Know**

3.72 Does your shop label all waste containers to prevent contamination of non-hazardous waste? (P2)

☐ **Yes** ☐ **No** ☐ **Don't Know**

Section 4: Solid Waste

Please read the entire Solid Waste Section (Section 4) in the workbook before you complete the questions below.

4.1 **Does your shop dispose of solid waste separately from hazardous waste? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

4.2 Does your shop have access to municipally provided solid waste pick-up /disposal services in Virginia?

☐ **Yes -** ***Skip to 4.3*** ☐ **No** ☐ **Don't Know**

4.2 (a) Does your shop hire a contractor to pick up and dispose of solid waste or does your shop properly dispose of solid waste yourself?

☐ **Yes** ☐ **No** ☐ **Don't Know**

4.2 (b) Is solid waste managed in proper containers (e.g., trash can, dumpster, roll-off)? (Req)

☐ **Yes** ☐ **No** ☐ **Don't Know**

4.2 (c) Do you have a regularly scheduled collection system for your normal solid waste (non-decaying) that is less than 90 days? (Req)

☐ **Yes** ☐ **No** ☐ **Don't Know**

4.3 Does your shop avoid storing parts or scrap material for long periods (i.e., longer than one year)? (BMP)

☐ **Yes** ☐ **No** ☐ **Don't Know**

4.4 Are lead acid batteries reclaimed or recycled in one year?

☐ **Yes** ☐ **No** ☐ **Don't Know**

4.5 Are there less than 100 tires stored on-site?

☐ **Yes** ☐ **No** ☐ **Don't Know**

4. 5 (a) **If 100 or more tires are stored on-site, then does your shop have a tire-storage permit? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

Best Management Practices for Pollution Prevention and Waste Reduction (BMP)

Refer to Section 4.3 in the workbook.

4.6 Does your shop keep storage and work areas clean and well organized?

☐ **Yes** ☐ **No** ☐ **Don't Know**

4.7 Does your shop inspect materials upon delivery, and immediately return unacceptable materials to the supplier?

☐ **Yes** ☐ **No** ☐ **Don't Know**

4.8 Does your shop keep accurate records of material usage to measure reductions in use?

☐ **Yes** ☐ **No** ☐ **Don't Know**

4.9 Does your shop assign someone to distribute and keep track of supplies and raw materials?

☐ **Yes** ☐ **No** ☐ **Don't Know**

4.10 Does your shop locate and repair all leaks to prevent losses?

☐ **Yes** ☐ **No** ☐ **Don't Know**

4.11 Does your shop practice preventive maintenance to avoid future losses from leaks?

☐ **Yes** ☐ **No** ☐ **Don't Know**

4.12 Does your shop keep waste streams separate to increase their potential for reuse, recycling, or treatment?

☐ **Yes** ☐ **No** ☐ **Don't Know**

4.13 Has your shop installed flow meters, flow control devices, and/or shut-off nozzles to cut down on water usage?

☐ **Yes** ☐ **No** ☐ **Don't Know**

4.14 Has your shop made raw material changes in the last twelve months that reduced or eliminated hazardous materials used in its operations?

☐ **Yes** ☐ **No** ☐ **Don't Know**

4.15 Does your shop have a first-in first-out policy for product storage areas to prevent materials from becoming outdated? (P2)

☐ **Yes** ☐ **No** ☐ **Don't Know**

Section 5: Water Pollution

Please read the entire Water Pollution Section (Section 5) in the workbook before you complete the questions below.

5.1 Does your facility have any floor drains in the shop area? - ***Refer to Section 5.3.1 in the workbook.***

☐ **Yes** ☐ **No -*Skip to 5.2*** ☐ **Don't Know**

5.1 (a) Does your shop have any open floor drains?

☐ **Yes** ☐ **No -*Skip to 5.1 (d)*** ☐ **Don't Know**

5.1 (b) **Are all open floor drains connected to a public sewer? (Req)**

☐ **Yes** ☐ **No* (out of compliance)** ☐ **Don't Know**

**If none of the open floor drains are connected to a public sewer, skip to 5.1 (d)*

5.1 (c) **Are those open floor drains connected to a public sewer permitted to discharge to the sewer? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

5.1 (d) Does your shop have any closed floor drains?

☐ **Yes** ☐ **No -*Skip to 5.2*** ☐ **Don't Know**

5.1 (e) **Have all closed floor drains been inspected by USEPA's Underground Injection Control (UIC) Program? (USEPA Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

5.1 (f) **Are all closed floor drains properly closed or sealed, according to the UIC Program? (USEPA Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

5.2 Is your shop on a public sewer system? - ***Refer to Section 5.3.2 in the workbook***

. ☐ **Yes** ☐ **No** ☐ **Don't Know**

5.3 Does your shop generate any process wastewater (e.g., water from wet sanding, water from washing auto body tools and equipment, work area washing, or car washing), or any industrial wastewater containing solvents, thinners, paint strippers, paints, cleaners, degreasers, auto fluids or any other pollutant?

☐ **Yes** ☐ **No - *Skip to 5.7*** ☐ **Don't Know**

5.4 Is process wastewater or industrial wastewater discharged to: - ***Refer to Section 5.2 in the workbook.***

5.4 (a) An open floor drain to a holding tank that is pumped and sent to a treatment facility for proper disposal?

☐ **Yes** ☐ **No** ☐ **Don't Know**

5.4 (b) Bathroom/ kitchen sinks, toilets, showers, shop wash basins, emergency showers, eyewash stations, or other non-industrial drainage outlets?

☐ **Yes** ☐ **No** ☐ **Don't Know**

5.4 (c) Storm drains or other runoff outlets (e.g., water runs down the street, water runs off to soil or sand area, or water just puddles up and evaporates)?

☐ **Yes** ☐ **No** ☐ **Don't Know**

5.4 (d) Streams, ditches, swales, or wetlands?

☐ **Yes** ☐ **No** ☐ **Don't Know**

5.4 (e) Other (specify) _____

5.5 What are potential receiving points for process waste or contaminated sanitary wastewater? ***Refer to Sections 5.3 and 5.3.3 in the workbook.***

5.5 (a) A septic system (i.e., a wastewater treatment or pretreatment system)

☐ **Yes** ☐ **No** ☐ **Don't Know**

5. 5 (b) A drywell or other subsurface leaching system (i.e. French drain)

☐ **Yes** ☐ **No** ☐ **Don't Know**

5. 5 (c) Direct discharge to a waterway

☐ **Yes** ☐ **No** ☐ **Don't Know**

5.5 (d) A holding tank

☐ **Yes** ☐ **No** ☐ **Don't Know**

5.5 (e) A cesspool

☐ **Yes** ☐ **No** ☐ **Don't Know**

5.5 (f) A sewer system

☐ **Yes – *Answer 5.6*** ☐ **No** ☐ **Don't Know**

5.5 (g) Other (Please Specify) _____

If you answered No to 5.5 (f), skip to 5.7

SEWER SYSTEM

5.6 **Does your shop have a process wastewater discharge permit, pretreatment permit, or other proper documentation allowing discharge to the local sewer? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

OTHER WASTEWATER MANAGEMENT PRACTICES

Refer to Section 5.4 in the workbook.

5.7 **Does your shop discharge only non-process wastewater to the subsurface (underground) by way of a septic system? (Req)**

☐ **Yes** ☐ **No - *Skip to 5.8*** ☐ **Don't Know**

5.7 (a) **Does your shop have Health Department or USEPA approval/permit to discharge non-process wastewater to the subsurface (underground) by way of a septic system? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

5.8 **Does your shop post signs prohibiting the discharge of industrial chemicals and/or wastewater to bathroom/ kitchen sinks, toilets, showers, shop wash basins, emergency showers, eyewash stations, or other non-industrial drainage outlets? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

5.9 **Does your shop prevent discharge of concentrated paints, fuels, oils and other vehicle fluids, solvents, thinners, strippers, cleaners (including concentrated soaps), and solid materials generated from sanding operations and other auto body repair preparation materials to Publicly Owned Treatment Works (POTW), underground and surface waters? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

5.10 Does your shop use dry cleaning methods, such as sweeping and vacuuming, when cleaning the shop? (P2)

☐ **Yes** ☐ **No** ☐ **Don't Know**

5.11 **Does your shop avoid sweeping, blowing, or washing floor dirt, dust, and/or other debris ("sweepings") down open floor drains, sink drains, or some other access way to water sources? (Req)**

☐ **Yes** ☐ **No (out of compliance)** ☐ **Don't Know**

5.12 Does your shop keep paints, cleaners, and any chemicals or materials that can cause runoff (indoors or otherwise) protected from rainwater? (P2 & Stormwater BMP)

☐ **Yes** ☐ **No** ☐ **Don't Know**

Section 6: Recycling - Best Management Practices for Recycling (BMP)

6.1 Is your shop recycling any of its waste products?

☐ **Yes** ☐ **No** ☐ **Don't Know**

6.2 Is your shop undertaking any reclamation activities?

☐ **Yes** ☐ **No** ☐ **Don't Know**

6.3 Has your shop purchased or used recycled products in the last twelve months?

☐ **Yes** ☐ **No** ☐ **Don't Know**

6.4 Is your shop claiming that anti-freeze, used oil, oil filters, etc. are not solid waste and are being sent for recycling?

☐ **Yes** ☐ **No** ☐ **Don't Know**

6.4 (a) If yes, do you have documentation that anti-freeze, used oil, oil filters, etc. are sent off-site or have the equipment on-site to do the recycling/reclaiming?

☐ **Yes** ☐ **No** ☐ **Don't Know**

Self-Certification Statement

Please note: Before you sign the following certification statement, please check off the following boxes to make sure you have:

- ❑ Read and understood the accompanying Compliance Assistance Workbook;
- ❑ Completely read and fill out this form (all questions should be answered unless you are directed to skip a question);
- ❑ Filled out, initialed and attached any required Return-to-Compliance Plan(s) (if needed); and
- ❑ Indicated the number of questions/requirements that are out of compliance for which you were directed to fill out a Return-to-Compliance Plan here:_____

Document Certification:

Facility Name: _____
Facility Registration Number: _____
Facility Location: _____
Type of Submittal Attached: _____

Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering and evaluating the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name of Responsible Official (Print): _____
Title: _____

Signature: _____ **Date:** _____

Mailing Address: _____ **Phone:** _____
_____

Check the job position that applies to you. You must have one of the following positions to sign this form:

- ❑ Business Owner
- ❑ If business is a partnership, General Partner
- ❑ If business is a sole proprietorship, Proprietor
- ❑ If business is a government facility, Most Senior Manager authorized by terms of employment
- ❑ If business is an educational facility, Instructor responsible for the auto body program

If business is a Corporation:

- ❑ President ❑ Secretary ❑ Treasurer
- ❑ Vice President (If authorized by corporate vote.)
- ❑ Representative of the above (If authorized by corporate vote and if responsible for overall operation of the shop.)

Return this form to:
Virginia Department of Environmental Quality
Northern Virginia Regional Office
Attn. Auto Body Self-Certification Program
13901 Crown Court
Woodbridge, VA 22193

Return-to-Compliance Plan Form

For each requirement question (Req) on the Facility Self-Certification Checklist that you answered as "out of compliance", you must complete and submit a Return-to-Compliance (RTC) Plan on this RTC form. If you have more than four "out of compliance" answers, make additional copies of this form as needed to fill out an RTC plan form for each such answer.

_____

Shop Name: _____

Contact Name and Phone Number: _____

Return-to-Compliance Plan #1:

a. What is the compliance question number on the Self-Certification Checklist for which you are reporting noncompliance? _____

b. Briefly describe the requirement that your shop is not currently fulfilling:

_____

_____

_____

c. What corrective action will you take to return to compliance?

_____

_____

_____

d. Date that you commit to being back in compliance: _____

e. Responsible Official who signed the Compliance Certification Form initial here: _____

Return-to-Compliance Plan #2:

a. What is the compliance question number on the Self-Certification Checklist for which you are reporting noncompliance? _____

b. Briefly describe the requirement that your shop is not currently fulfilling:

_____

_____

_____

c. What corrective action will you take to return to compliance?

_____

_____

_____

d. Date that you commit to being back in compliance: _____

e. Responsible Official who signed the Compliance Certification Form initial here: _____

Make copies of this page as needed before completing.

Shop Name: _____
Contact Name and Phone Number: _____

Return-to-Compliance Plan #__:

a. What is the compliance question number on the Self-Certification Checklist for which you are reporting noncompliance? _____

b. Briefly describe the requirement that your shop is not currently fulfilling:

_____
_____
_____

c. What corrective action will you take to return to compliance?

_____
_____
_____
_____

d. Date that you commit to being back in compliance: _____

e. Responsible Official who signed the Compliance Certification Form initial here: _____

Return-to-Compliance Plan #__:

a. What is the compliance question number on the Self-Certification Checklist for which you are reporting noncompliance? _____

b. Briefly describe the requirement that your shop is not currently fulfilling:

_____
_____
_____

c. What corrective action will you take to return to compliance?

_____
_____
_____
_____

d. Date that you commit to being back in compliance: _____

e. Responsible Official who signed the Compliance Certification Form initial here: _____